

United Way Suncoast Whistleblower Policy

General

The United Way Suncoast's ("UWS") Code of Ethics (the "Code") directs directors, officers and team members to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As team members and representatives of the Organization, we must expect from each other honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

It is the responsibility of all directors, officers, standing committee members and team members to comply with the Code and to report violations or suspected violations in accordance with this Whistleblower Policy.

No Retaliation

No director, officer, standing committee member or team member who, in good faith, reports a violation of the Code shall suffer harassment, retaliation or adverse employment consequence. A team member who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable team members and others to raise serious concerns within the Organization prior to seeking resolution outside the Organization.

Reporting Violations

The Code addresses UWS's open-door policy and encourages team members to share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, a manager is in the best position to address an area of concern. However, if a team member is not comfortable speaking with their manager or they are not satisfied with the manager's response, they are encouraged to speak with anyone on the Leadership Team. Managers are required to report suspected violations of the Code to the Organization's Ethics Officer (the "EO"), the Chairperson of the Audit & Ethics Committee, who has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or when a team member is not satisfied or uncomfortable with following the Organization's open-door policy, individuals should contact the Organization's Ethics Officer directly.

Ethics Officer

The EO is responsible for investigating and resolving all reported complaints and allegations concerning violations of the Code and, at the EO's discretion, shall advise the President/CEO and/or the Audit & Ethics Committee (the Committee). The EO is the Chair of the Committee and is required to report to the Board of Directors at least annually on compliance activity.

Accounting and Auditing Matters

The Audit & Ethics Committee of the Board of Directors shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The EO shall immediately notify the Audit & Ethics Committee of any such complaint and work with the committee until the matter is resolved.

Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation of the Code must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Code. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously via email or mail. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Violations

The EO will notify the sender and acknowledge receipt of the reported violation or suspected violation within five (5) business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

The Ethics Officer can be contacted via a confidential email address: whistleblower@uwsuncoast.org

Approved: March 22, 2006

Board Approved (revised): March 28, 2012 (Updated for Suncoast name change 10/8/12)

Board Approved (revised): May 16, 2016

Board Approved (revised): August 23, 2023

Signature

Date