



Whistleblower Policy

1. Purpose:

The Sua Sponte Foundation (SSF) is committed to maintaining the highest standards of ethical conduct and integrity in all of its operations. As part of this commitment, SSF encourages its Board of Directors and members of the advisory board to report any suspected violations of laws, regulations, or organizational policies. This Whistleblower Policy is designed to provide avenues for individuals to raise concerns without fear of retaliation and to ensure that such concerns are addressed promptly and appropriately.

2. Scope:

This policy applies to all Board of Directors, and members of the advisory board of the Sua Sponte Foundation.

3. Reporting Procedure:

- a. Any individual who becomes aware of suspected wrongdoing or unethical behavior within the Foundation should report their concerns promptly to the Chief Officer of the Board of Directors.
- b. If the concern involves the Chief Officer of the Board of Directors, the report should be made directly to the Vice President of the Board of Directors.
- c. Reports may be made verbally or in writing and should include as much detail as possible, including the nature of the alleged violation and any supporting evidence.

4. Confidentiality:

- a. Reports of suspected wrongdoing will be treated with the utmost confidentiality to the extent possible, consistent with the need to conduct a thorough investigation.
- b. Information concerning reports and investigations will be disclosed only to those individuals with a need to know for purposes of investigation and resolution.

5. Non-Retaliation:

The SSF prohibits retaliation against any individual who, in good faith, reports suspected wrongdoing. Retaliation against whistleblowers will not be tolerated and may result in disciplinary action, up to and including removal from the Board of Directors or advisory board.

6. Investigation and Resolution:

- a. Upon receipt of a report, the Board of Directors will promptly initiate an investigation to determine the validity of the concerns raised.

b. The investigation will be conducted in a fair and impartial manner, with due regard for the rights of all parties involved.

c. Upon completion of the investigation, the Board of Directors will take appropriate action to address any confirmed violations, which may include disciplinary action, corrective measures, or referral to law enforcement authorities.

7. Recordkeeping:

Records of all reports received, and actions taken, will be maintained by the Board of Directors in accordance with applicable legal requirements.

8. Distribution and Acknowledgment:

This Whistleblower Policy shall be distributed to all Board of Directors and members of the advisory board of the SSF. All individuals subject to this policy shall acknowledge receipt and understanding of its provisions.

9. Compliance:

All SSF Board of Directors, and members of the advisory board are expected to comply with this Whistleblower Policy. Failure to do so may result in disciplinary action, up to and including removal from the Board of Directors or advisory board.

10. Review and Revision:

This Whistleblower Policy shall be reviewed periodically by the Board of Directors and revised as necessary to ensure its effectiveness and compliance with applicable laws and regulations.