



## **Whistleblower Protection Policy**

Climate Rights International requires directors, officers, contractors, and employees to act honestly and with integrity, in accordance with high ethical standards, and to comply with applicable laws, regulations, and organization policies in the conduct of their duties. Climate Rights International is committed to facilitating open and honest communications in all matters pertaining to its governance, finances, operations, and compliance with applicable laws, regulations, and policies, and encourages the reporting of good faith concerns, complaints, and violations.

### **Reporting Responsibility**

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that Climate Rights International can address and correct inappropriate conduct and actions. Any director, officer, contractor, or employee who violates or suspects any violation of the law, regulations, organization policies, or accounting, auditing, and financial reporting controls must report such activity as soon as possible by submitting a report under this policy. It is important that Climate Rights International be apprised about unlawful or improper behavior including, but not limited to, any of the following conduct:

- theft;
- financial reporting that is intentionally misleading;
- improper or undocumented financial transactions;
- destroying or tampering with any record or document with the intent to obstruct a pending or contemplated audit, review or investigation;
- improper use of organization assets;
- corruption or bribery;
- insider trading;
- payment for services or goods that are not rendered or delivered;
- violations of the organization's Conflict of Interest Policy; and
- any other improper occurrence regarding cash, financial procedures, or financial reporting;
- other illegal activities.

### **No Retaliation**

It is contrary to the values of Climate Rights International for anyone to retaliate against any board member, officer, employee, contractor, or intern who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of Climate Rights International. An employee who

retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

### **Reporting Procedure**

Climate Rights International has an open door policy and suggests that employees share their questions, concerns, suggestions, or complaints with their supervisor. If you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with the Executive Director, Brad Adams, or Vicechair of the Board, Frank Hesse. Supervisors and managers are required to report complaints or concerns about suspected ethical and legal violations in writing to Climate Rights International's Board of Directors.

### **Accounting and Auditing Matters**

Climate Rights International's Executive Director shall immediately notify the Board of Directors of any concerns or complaint regarding corporate accounting practices, internal controls, or auditing, and work with the Board until the matter is resolved.

### **Acting in Good Faith**

Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. 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. 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**

Climate Rights International's Executive Director, or Vicechair of the Board, will notify the person who submitted a complaint by acknowledging receipt of the reported violation or suspected violation. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

### **Contact Information**

Brad Adams, Executive Director

[REDACTED]

Frank Hesse, Vice-Chair of the Board

[REDACTED]

**Approved by the Board.**