

## **TURTLE SURVIVAL ALLIANCE FOUNDATION WHISTLEBLOWER POLICY**

### **Introduction**

**Turtle Survival Alliance Foundation** (the “Corporation”) requires all directors, officers, contractors, and employees of the Corporation to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. The employees and representatives of the Corporation must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that the Corporation can address and correct inappropriate conduct and actions.

### **Reporting of Concerns or Complaints**

It is the responsibility of all Board members, officers, employees, contractors and volunteers to comply with the Corporation’s Code of Ethics and applicable laws and regulations and to report concerns about violations or suspected violations.

### **Confidentiality**

The Corporation will treat all communications under this Policy in a confidential manner, except to the extent necessary (i) to conduct a complete and fair investigation, or (ii) for review of the Corporation’s operations by the Corporation’s Board of Directors and officers, the Corporation’s independent public accountants, and the Corporation’s legal counsel.

### **Retaliation**

It is contrary to the values of the Corporation for anyone to retaliate against any board member, officer, employee, contractor, or volunteer who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, sexual harassment, or suspected fraud, or suspected violation of any law or regulation governing the operations of the Corporation. Retaliation in any form will not be tolerated. Any act of alleged retaliation should be reported immediately and will be promptly investigated. An officer or employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Policy is intended to encourage and enable employees, contractors, volunteers and others to raise serious concerns within the Corporation prior to seeking resolution outside the organization.

### **How To Report Concerns or Complaints**

The Corporation has an open door policy and suggests that employees, contractors, and volunteers share their questions, concerns, suggestions or complaints with their supervisor.

If, however, an employee, contractor, or volunteer is not comfortable speaking to his or her supervisor, or is not satisfied with the supervisor’s response, the employee is encouraged to contact the Chair of the Board, at: [Boardchair@turtlesurvival.org](mailto:Boardchair@turtlesurvival.org), or the Chair of the Board’s Governance Committee, at: [GovChair@turtlesurvival.org](mailto:GovChair@turtlesurvival.org). Board members or officers should share questions, concerns, or complaints directly with the Chair of the Board or the Chair of the Governance Committee.

Supervisors and managers are required to report complaints or concerns received by them about suspected ethical or legal violations which are made to them, or which they have themselves, in writing to the Chair of the Board or to the Chair of the Governance Committee. The individual who receives the report of the complaint or concern will have the responsibility to investigate it.

A complainant may choose to remain anonymous. Whether or not a complainant identifies himself or herself, in order for a proper investigation to be conducted, it is prudent for a complainant to provide with

as much information as possible, sufficient to do a proper investigation, including where and when the incident occurred, names and titles of any individuals involved, and as much other detail as possible.

### **Illustrative Types of Concerns**

The following is a nonexhaustive list of the kinds of improprieties that should be reported:

- Providing false information of any sort to, or withholding material information from, the Corporation's Board of Directors, its officers, or its accountants.
- Destroying, altering, mutilating, concealing, covering up, falsifying, or making a false entry in any books or records of the Corporation.
- Embezzling, self-dealing, private inurement (i.e., the Corporation's earnings inuring to the benefit of a director, officer, or senior management), private benefit (i.e., the Corporation's assets being used by anyone in the organization for personal gain or benefit), or otherwise misusing funds.
- Possible violation of the Corporation's Code of Ethics, including harassment of any nature, or of applicable laws relating to the work that the Corporation is performing in any country.
- Facilitating or concealing any of the above or similar actions.

### **Acting in Good Faith**

Anyone filing a complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing that 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 a serious disciplinary offence.

### **Handling of Reported Violations**

The Chair of the Board, or the Chair of the Governance Committee, as applicable, will notify a person who submitted a complaint and acknowledge receipt of it. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

The Chair of the Governance Committee, and the Chair of the Board, as applicable, will advise the Board of all complaints and their resolution and will report at least annually to the Chair of the Finance Committee on compliance activity relating to accounting or alleged financial improprieties. The Chair of the Governance Committee will immediately notify the Chair of the Finance Committee of any concerns or any complaint regarding corporate accounting practices, internal controls, or auditing and will work with that Committee until the matter is resolved.

Current Chair of the Governance Committee: John Mitchell  
Current Chair of the Board: Patricia Koval