



Whistleblower and Investigations Policy

The Turtle Survival Alliance Foundation ("Turtle Survival Alliance" or "we") requires all directors, officers, employees, interns, volunteers, contractors (including consultants and grantees, their employees, sub-grantees and sub-contractors) to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. These persons and any other representatives of Turtle Survival Alliance must practice honesty and integrity in fulfilling their responsibilities and comply with our policies, applicable laws and regulations. This Whistleblower and Investigations Policy is intended to encourage and enable employees and other persons to raise serious concerns internally so that we can address and correct, or otherwise take remedial action, to deal with inappropriate conduct and actions. This specifically includes but is not limited to encouraging any person to raise concerns about harassment or other forms of discrimination against persons who work for or with Turtle Survival Alliance.

Reporting of Concerns or Complaints

It is the responsibility of all directors, officers, employees, interns, volunteers and contractors to comply with our Code of Ethics, our Social Safeguards Policy and applicable laws and regulations and to report concerns about violations or suspected violations.

Participation in Investigations

It is the responsibility of all directors, officers, employees, interns, volunteers and contractors to cooperate fully during any investigation into concerns/complaints raised under this Whistleblower and Investigations Policy. Cooperation shall include, but not be limited to, making oneself available for interviews, providing copies of documents or electronic files upon request, and providing complete and candid information that is relevant to the investigation.

Confidentiality

Turtle Survival Alliance will treat all communications under this Policy in a confidential manner, except to the extent necessary (i) to conduct a complete and fair investigation through Turtle Survival Alliance, including with the assistance of legal counsel and any investigator retained by legal counsel, or (ii) for review of our operations by our Board of Directors and officers, our independent public accountants, and legal counsel retained by Turtle Survival Alliance or its Board of Directors.

Retaliation

It is contrary to the values of Turtle Survival Alliance for anyone to retaliate against any director, officer, employee, intern, volunteer or contractor 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 our Social Safeguards Policy or of any law or regulation governing the operations of Turtle Survival Alliance. Retaliation in any

form will not be tolerated by us. Any act of alleged retaliations should be reported to the President and Chief Executive Officer and/or Governance Committee Chair, and/or the Chair of the Board, and/or, in Madagascar, the Country Director, immediately and will be promptly investigated. An officer, employee or intern 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, interns, volunteers, contractors and others to raise serious concerns within Turtle Survival Alliance prior to seeking resolution outside the organization.

It is also contrary to the values of Turtle Survival Alliance for anyone to retaliate against any director, officer, employee, intern, volunteer or contractor who participates in an investigation by providing information, supporting a complainant, or expressing views about issues covered by the investigation. Retaliation in any form will not be tolerated. Any act of alleged retaliation should be reported immediately to one of the persons referred to above and will be promptly investigated. A director, officer, employee, intern or volunteer who retaliates against someone who has participated in an investigation is subject to appropriate counseling and to discipline, up to and including termination of Turtle Survival Alliance-related responsibilities. This Policy is intended to encourage and enable all persons to participate freely in the investigation process without fear of retribution.

How To Report Concerns or Complaints

We have an open-door policy and suggest that officers, employees, interns, volunteers and contractors share their questions, concerns, suggestions, or complaints with their supervisor at Turtle Survival Alliance. Directors should ordinarily share questions, concerns, suggestions, or complaints with the Chair of the Board. We are also committed to hearing concerns about our personnel or activities from any other persons who interact with the programs, projects or activities of the Alliance.

If an officer, employee, intern, volunteer or contractor is not comfortable speaking to his or her supervisor at Turtle Survival Alliance or is not satisfied with the supervisor's response, or if a concern is raised by someone who is not in an officer, employee, intern, volunteer or contractor role, the concern may be directed to the President and Chief Executive Officer, ceo@turtlesurvival.org, to the Chair of the Governance Committee, governance@turtlesurvival.org, to the Chair of the Board, boardchair@turtlesurvival.org, or, if the person is in Madagascar, to the Country Director, unless any such party is implicated in the allegation.

Supervisors and managers at Turtle Survival Alliance are required to report complaints or concerns received by them about suspected ethical, policy or legal violations which are made to them, or which they have themselves made, in writing to the President and Chief Executive Officer, or, if they are in Madagascar, to the Country Director, unless that person is implicated in the allegations or the complainant prefers to report complaints or concerns to another party. In that case, the supervisors and managers should report to the Chair of the Governance Committee, or the Chair of the Board, as they prefer, or, if the supervisors and managers are in Madagascar, they may also choose to report to the President and Chief Executive Officer. The individual who receives the report of the complaint or concern will have the responsibility to ensure that Turtle Survival Alliance takes appropriate steps to investigate it.

A complainant may choose to remain anonymous. Whether or not a complainant identifies themselves, it may be necessary to investigate. For a proper investigation to be conducted, the person receiving a complaint must take steps to learn relevant details about the allegations, including asking to receive as much information as possible, 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 non-exhaustive list of the kinds of improprieties that should be reported:

- Providing false information of any sort to, or withholding material information from, the Board of Directors, our officers, our accountants or our legal counsel.
- Destroying, altering, mutilating, concealing, covering up, falsifying, or making a false entry in any books or records of Turtle Survival Alliance.
- Embezzling, self-dealing, private inurement (i.e., our earnings inuring to the benefit of a director, officer, or senior management), private benefit (i.e., our assets being used by anyone in the organization for personal gain or benefit), or otherwise misusing funds.
- Possible violation of our Code of Ethics or of our Social Safeguards Policy or possible violation of applicable laws relating to the work that we are performing, funding or otherwise supporting 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 as a serious disciplinary offense.

Handling of Reported Violations

The President and Chief Executive Officer, the Chair of the Governance Committee, the Chair of the Board, or, in Madagascar, the Country Director, as applicable, will notify a person who submitted a complaint to them and acknowledge receipt of it. All reports will be promptly investigated by the party receiving the complaint and appropriate corrective action will be taken if warranted by the investigation.

The President and Chief Executive Officer, the Chair of the Governance Committee, the Chair of the Board, or, in Madagascar, the Country Director, as applicable, will advise our Board of Directors of any concerns or complaints received and their resolution and will report at least annually to the Chair of the Audit and Finance Committee on compliance activity relating to accounting or alleged financial improprieties. The President and Chief Executive Officer, the Chair of the Governance Committee, the Chair of the Board, or, in Madagascar, the Country Director, as the applicable recipient of a concern or complaint, will immediately notify the Chair of the Audit and 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.

If a complaint made under this Whistleblower and Investigations Policy is directed against an individual who is not employed by Turtle Survival Alliance, but who is employed by an organization or individual that receives funding from us or otherwise works with us, the person who receives the complaint or concern, on our behalf, will advise the complainant to also submit their complaint directly to the employer of the individual who is the subject of the complaint. In such event, however, the person will advise our President and Chief Executive Officer to document the concern or complaint on our behalf and to attempt to take all appropriate and lawful steps to support the complainant in their efforts to get concerns addressed and to be protected against any form of mistreatment. Violations of our Code of Ethics or Social Safeguards Policy by a contractor (including a consultant, grantee, their employees, a sub-grantee or sub-contractor) may result in Turtle Survival Alliance withholding, suspending or demanding repayment of funds or the termination of the relevant contract, grant or other arrangement.

Last approved by the Board of Directors on May 21, 2025