

# The Haitian Project, Inc.

## Whistleblower Protection Policy

The Haitian Project, Inc. (the "Project") requires directors, officers, employees and long-term Volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the Project, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

### Reporting Responsibility

This Whistleblower Policy is intended to encourage and enable employees and other community members to raise serious concerns internally so that the Project can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, and employees to report concerns about violations of the Project's code of ethics or suspected violations of law or regulations that govern the Project's operations.

### No Retaliation

It is contrary to the values of the Project for anyone to retaliate against any board member, officer, employee or other community member 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 the Project. An employee who retaliates against someone who has reported a violation in good faith is subject to disciplinary action up to and including termination of employment. Disciplinary actions for any director or officer shall be handled in accordance with the bylaws of the Project.

### Reporting Procedure

The Project has an open door policy and encourages employees and other members of the community to share their questions, concerns, suggestions or complaints with their supervisor. If an employee or other community member is not comfortable speaking with their supervisor or is not satisfied with the supervisor's response, they are encouraged to speak with the Project's Compliance Officers. Supervisors and managers are required to report complaints or concerns about suspected ethical and legal violations in writing to the Project's Compliance Officers, who have the responsibility to investigate all reported complaints. Employees with concerns or complaints may also submit their concerns in writing directly to their supervisor, or the President, or the Chair of the Board or the Project's Compliance Officers.

### Compliance Officers

The Project's Compliance Officers are responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Compliance Officers will promptly advise the President and Chair of the Board of Directors of all complaints and their resolution and will report at least annually to the Treasurer on compliance activity relating to accounting or alleged financial improprieties.

### Accounting and Auditing Matters

The Project's Compliance Officers shall immediately notify the Treasurer and the Chair of the Finance Committee of any concerns or complaint regarding corporate accounting practices, internal controls or auditing and work with the committee 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 and the Project's disclosure requirements.

### Handling of Reported Violations

The Project's Compliance Officers will notify the person who submitted a complaint and acknowledge 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.

### Compliance Officers:

Timothy Scordato  
1<sup>st</sup> Vice Chair of THP's Board of Directors  
timscordato@gmail.com

M. Aimée Maier  
2<sup>nd</sup> Vice Chair of THP's Board of Directors  
a.maier@haitianproject.org

### Rhode Island Whistleblower Protection Act

Rhode Island law further protects employee whistleblowers. Under the law, employees who report potential fraudulent or illegal activity, will be protected under the provisions of the Act. The content of the Rhode Island Whistleblowers' Protection Act is as follows:

An employer shall not discharge, threaten, or otherwise discriminate against an employee regarding the employee's compensation, terms, conditions, location, or privileges of employment, nor shall the employer report or threaten to report an employee's immigration status, because:

- The employee, or a person acting on behalf of the employee, reports or is about to report to a public body, verbally or in writing, a violation which the employee knows or reasonably believes has occurred or is about to occur, of a law or regulation or rule promulgated under the law of this State, a political subdivision of this State, or the United States, unless the employee knows or has reason to know that the report is false;
- an employee is requested by a public body to participate in an investigation, hearing, or inquiry held by that public body, or a court action;
- an employee refuses to violate or assist in violating federal, state or local law, rule or regulation; or
- the employee reports verbally or in writing to the employer or to the employee's supervisor a violation, which the employee knows or reasonably believes has occurred or is about to occur, of a law or regulation or rule promulgated under the laws of this State, a political subdivision of this State, or the United States, unless the employee knows or has reason to know that the report is false. Provided, however, that if the report is verbally made, the employee must establish by clear and convincing evidence that such report was made.

If an employee believes their rights under this statute have been violated, please report this immediately to one of the Project's Compliance Officers.

### Schedule of Revisions:

March 14<sup>th</sup>, 2015: Passed by Board of Directors

August 13<sup>th</sup>, 2022: Changes passed by Board of Directors