

# Haystack Project Whistleblower Protection Policy

Adopted 1/28/21.

Haystack Project (Haystack) requires directors, officers and employees to observe the highest standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of Haystack 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 others to raise serious concerns internally so that Haystack can address and correct inappropriate report concerns about violations Haystack's code of ethics or suspected violations of law or regulations that govern Haystack's operations.

**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 and may result in disciplinary actions including termination of employment.

**Confidentiality:** Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

**No Retaliation:** It is contrary to the values of Haystack for anyone to retaliate against any board member, officer, employee or volunteer who in good faith reports a suspected violation of any regulation governing the operations of Haystack. An employee or Director who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment or removal from the Board.

**Reporting Procedure:** Haystack suggests that employees share their questions, concerns, suggestions or complaints directly with the Executive Director. The Executive Director shall immediately notify the Board of Directors of any concerns or complaint regarding corporate accounting practices, or internal controls and work with the Board of Directors until the matter is resolved. Questions, concerns or complaints involving the Executive Director should be directed to the Chairman of the Board of Directors.

**Handling of Reported Violations:** Haystack's Executive Director will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation within two business days. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation.