

BOULDER JUNCTION COMMUNITY FOUNDATION INC.

Reporting of Unethical/Illegal Conduct and Non-Retaliation Policy (“Whistleblower Policy”)

The Boulder Junction Community Foundation Inc. (“Foundation”) is committed to lawful and ethical behavior in all of its activities and requires its directors, officers and committee members to conduct themselves in a manner that complies with all applicable laws and regulations. This Policy is intended to encourage anyone who comes in contact with the Foundation to raise serious concerns without fear of retaliation in any form.

A copy of this policy will be posted on the Foundation’s Web site, boulderjunctioncf.org, and retained in the Foundation’s permanent corporate records.

If at any time a concern exists regarding the propriety or legality of any action contemplated to be taken or that has been taken by any Foundation director, officer, donor, grantee, contractor, or vendor as the action relates to Foundation activities, or if an action needs to be taken in order for the Foundation to be in compliance with law or appropriate ethical standards, a director, officer or affected person may address the issue directly by going to any officer of the Foundation, including the President of the BJCF, as needed until matters are satisfactorily resolved.

Alternatively, if you are not comfortable speaking to the President, or do not feel your issue has been properly addressed, you may contact any member of the Foundation’s Board of Directors.

Under this policy (sometimes referred to as a “whistleblower policy”), those who report illegal or improper activity will be protected. Efforts will be made to treat a report of unethical or illegal conduct as confidential, consistent with the need to investigate and prevent or correct the action. The individual making the report will not be discharged, threatened, harassed, or discriminated against for reporting in good faith what they perceive to be wrongdoing, violations of law, or unethical conduct. A director or officer who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including removal from office. Likewise, any unsubstantiated allegations that prove to have been made maliciously or knowingly to be false will be viewed as a serious offense.

The Board of Directors shall address all reported concerns or complaints regarding accounting practices, internal controls, or auditing. The legal counsel designated by the Board of Directors shall address all other complaints regarding the propriety or legality of an action or proposed action. All complaints shall be addressed within twenty-one (21) days of the receipt of the complaint by either the President or the Board of Directors.

Approved by the Board of Directors on December 17, 2013