

Whistleblower Policy

Together requires Board members, committee members and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities, and all directors, committee members and employees to comply with all applicable laws and regulatory requirements. The Whistleblower Policy is applicable to legal and ethical concerns and is to be utilized only after the employee who has reasonable suspicion of a legal and/or ethical concern(s) has contacted his/her/their immediate supervisor or the Director of Human Resources. Relatedly, information that an employee reasonably believes is evidence of gross mismanagement of a Federal contract or grant, a gross waste of Federal funds, an abuse of authority relating to a Federal contract or grant, a substantial and specific danger to public health or safety, or a violation of law, rule, or regulation related to a Federal contract applies to the use of the Whistleblower Policy.

Reporting Responsibility

Together seeks to have an “Open Door Policy” and encourages Board members and employees to share their questions, concerns, suggestions or complaints regarding Together and its operations with someone who can address them properly. In most cases, a Board member or committee member should present concerns to the Chair of the Board. The President & CEO and the Director of Human Resources are generally in the best positions to address an employee’s area of concern. However, if a Board member is not comfortable speaking with the Board Chair or is not comfortable with the Board Chair’s response, or if an employee is not comfortable speaking with the President & CEO or if the employee is not satisfied with the President & CEO’s response, the Board member, committee member or employee is encouraged to speak with anyone on the Board whom the employee is comfortable in approaching. Contact information for the President & CEO and Board Chair can be found at the bottom of this policy.

No Retaliation

No Board member, committee member, or employee who in good faith reports a violation of a law or regulation requirement shall suffer harassment, retaliation or adverse employment consequence. An 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 Whistleblower Policy is intended to encourage and enable persons to raise serious concerns within Together prior to seeking resolution outside Together.

Compliance Officer

Together's Director of Human Resources, working with the President & CEO, will act as Together's Compliance Officer. The Compliance Officer is responsible for investigating and resolving all employee complaints and allegations concerning violations of the Principles and/or Code. The President & CEO or his/her/their designee will take on the Compliance Officer role if the complaint involves the Director of Human Resources. If the complaint involves both the President & CEO and the Director of Human Resources, the Chair of the Board of Directors or his/her/their designee will carry out the functions of the Compliance Officer.

Accounting and Auditing Matters

The Finance Committee of the Board of Directors shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Compliance Officer shall immediately notify the Finance Committee of any such complaint and work with the Committee until the matter is resolved.

Requirement of Good Faith

Anyone filing a complaint concerning a violation or suspected violation of the law or regulation requirements 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 or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Violations

The Compliance Officer, or the person responsible for carrying out the Compliance Officer's role with respect to a reported or suspected violation, will acknowledge receipt of the reported violation or suspected violation and will initiate an investigation. All reports will be promptly investigated (2-4 weeks), and appropriate corrective action will be taken if warranted by the investigation.

Reporting Contacts

Mike Hornacek, President & CEO;

mhornacek@togetheromaha.org

Cristina Castro-Matukewicz, Board Chair

cristina.v.castro-matukewicz@wellsfargo.com

[Anonymous Reporting \(Online\)](#)

<https://forms.office.com/r/TFzswYPiju>