

HABITAT FOR HUMANITY/BUFFALO INC.

WHISTLEBLOWER POLICY¹

GENERAL

Habitat for Humanity/Buffalo encourages and expects its employees, officers, directors, and agents to maintain high ethical standards. This whistleblower policy is meant to provide a confidential and effective means for reporting suspected violations of the law. It further serves to protect individuals who report suspected violations from retaliation in any form. The matters which should be reported under this policy include suspected fraud, theft, embezzlement, accounting or auditing irregularities, bribery, kickbacks, misuse of Organization assets or suspected regulatory, compliance, or ethics related issues, concerns or violations. These policies are not a vehicle for reporting violations of the Organization's applicable human resources policies, problems with co-workers or managers, or for reporting issues related to alleged employment discrimination or sexual harassment or any other form of unlawful harassment. A copy of this whistleblower policy must be provided to all officers, employee, trustees, and directors of Habitat for Humanity/Buffalo, as well as any volunteers who provide substantial services to it.

PRESIDENT OF THE BOARD OF DIRECTORS

The President of the Board of Directors is responsible for investigating and resolving all reported complaints and allegations concerning the ethical and legal standards noted above. The President of the Board of Directors is required to report to the full Board of Directors at least annually on compliance activity. The Nominating and Governing Committee of the Board of Directors shall assist the President of the Board of Directors in ensuring compliance with this whistleblower policy. Upon resolution of a complaint, the President of the Board of Directors shall consult with the Nominating and Governance Committee to discuss the efficacy of the process and procedure followed with respect to the complaint.

REPORTING RESPONSIBILITY

It is the responsibility of all directors, officers, and employees to report violations or suspected violations of business and personal ethical standards and/or applicable legal requirements (violations) in accordance with the Whistleblower Policy.

REPORTING VIOLATIONS

If an individual reasonably believes that some practice of Habitat for Humanity/Buffalo or an employee, officer, director, or agent of Habitat for Humanity/Buffalo, or another individual entity with whom Habitat for Humanity/Buffalo has a business relationship is in violation of the law or a clear mandate or public policy, the individual must file a written complaint with the President of the Board of Directors, unless such person is the subject of the complaint, in which case the individual shall file the written complaint with the Vice President of the Board of Directors. Such individual shall also, at all times, have the right to notify any member of the Board of Directors of the organization or any federal, state, or local law enforcement agency.

¹ Adopted by vote of the Habitat for Humanity/Buffalo Board of Directors on March 28, 2017.

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.

ACTING IN GOOD FAITH

An individual is not required to prove the truth of an allegation, but is required to act in good faith. Any individual who does not act in good faith and makes a complaint that is knowingly false or for the purpose of harassment in reporting a suspected violation may be subject to disciplinary action up to and including termination

HANDLING OF REPORTED VIOLATIONS

Within five (5) business days of receipt of the complaint, the President of the Board of Directors will contact the complainant and acknowledge receipt of the complaint and shall also notify the Executive Committee of the Board of Directors that such a complaint has been received. The complainant will be notified about what actions will be taken. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation. If no further action or investigation is to follow, an explanation for the decision will be given to the complainant. Any complainant who reasonably believes they have been retaliated against in violation of this whistleblower policy shall follow the same procedures as they did when they filed the original complaint.

ACCOUNTING AND AUDITING MATTERS

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

NO RETALIATION

An individual may report a suspected violation anonymously or on a confidential basis, keeping in mind that in the course of the investigation it may become necessary that the source of the complaint be identified. No individual who reports a suspected violation in good faith, whether or not the allegation turns out to be correct, shall be subject to any form of retaliation, including harassment, demotion, or firing, by Habitat for Humanity/Buffalo or its employees, officers, directors, and agents. Anyone who retaliates against a complainant shall be subject to disciplinary action, up to and including termination. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within the Organization prior to seeking resolution outside the Organization.