

Whistleblower Protection Policy

PURPOSE

Firewheel STEM Institute (the “Organization”) is committed to maintaining the highest standards of integrity and ethical behavior. The purpose of this **Whistleblower Protection Policy** is to provide a safe and confidential process for employees, volunteers, directors, and others to report concerns about unlawful or unethical conduct, financial misconduct, fraud, or violations of the organization’s policies or applicable laws without fear of retaliation.

This policy aims to encourage transparency and accountability, and to protect individuals who report misconduct in good faith.

SCOPE

This policy applies to all employees, board members, volunteers, contractors, and consultants of the Organization. It covers reports of misconduct related to:

- Financial misconduct (e.g., fraud, embezzlement, accounting irregularities)
- Violations of laws or regulations
- Violation of the Organization’s policies or ethical guidelines
- Harassment or discrimination
- Unsafe working conditions

REPORTING VIOLATIONS

1. How to Report

Any individual who becomes aware of misconduct or unethical behavior is encouraged to report it immediately. Reports can be made by:

- Direct reporting to a supervisor or manager (if appropriate)
- Contacting the Board Chairperson directly
- Using an anonymous reporting system (if available)
- Contacting an external, independent party such as a legal or compliance officer.

2. Confidentiality

Reports will be kept confidential to the extent possible, consistent with the need to conduct a thorough investigation. Individuals making reports may remain anonymous, though providing contact information can help ensure thorough follow-up.

PROTECTION FROM RETALIATION

1. Non-Retaliation

The Organization strictly prohibits retaliation or harassment against anyone who, in good faith, reports a violation or suspected violation of the law,

organizational policy, or ethical standards. Retaliation includes but is not limited to:

- Termination
- Demotion
- Disciplinary action
- Harassment
- Any other form of adverse treatment

2. Protection for Whistleblowers

If an individual experiences retaliation or adverse consequences as a result of making a report, they should immediately report the retaliation to the Board Chairperson, or an alternative designated person identified by the Board, who will investigate the claim promptly and take appropriate action.

INVESTIGATION PROCESS

1. Initial Review

Upon receiving a report, the Organization will acknowledge receipt of the report within 10 business days. The matter will be investigated by the designated person or committee assigned by the Board, which may include an internal or external investigator, depending on the nature of the issue.

2. Confidential Investigation

The Organization will investigate the concern in a timely and thorough manner, ensuring confidentiality for all parties involved. The individual who reported the misconduct will be informed of the outcome, though the details of the investigation may be kept confidential to protect privacy.

3. Corrective Action

If the investigation confirms that misconduct or violations have occurred, the Organization will take appropriate corrective actions, which may include disciplinary action, legal action, or changes in policy.

GOOD FAITH REPORTING

Individuals are encouraged to report misconduct in good faith, but false accusations made with the intent to harm or mislead will not be tolerated and may result in disciplinary action.

POLICY ADMINISTRATION

This policy is administered by the Board of Directors. The policy will be reviewed periodically, and any amendments will be approved by the Board.