

WHISTLEBLOWER POLICY

NARAL Pro-Choice America is committed to the highest possible standards of ethical, moral and legal business conduct. In line with this commitment and NARAL Pro-Choice America's commitment to open communication, this policy aims to provide an avenue for you to raise concerns and reassurance that you will be protected from reprisals or victimization for whistleblowing. This whistleblower policy is intended to address protections in the event you raise serious concerns regarding improper activities that could reflect negatively on NARAL Pro-Choice America, such as:

- incorrect financial reporting;
- unlawful activity;
- activities that are not in line with NARAL Pro-Choice America policy; or
- activities which otherwise amount to improper conduct.

Safeguards

Harassment or Victimization – Harassment or victimization for reporting concerns under this policy will not be tolerated.

Confidentiality – Every effort will be made to protect the identity of those who raise concerns in conjunction with this policy.

Anonymous Allegations – This policy encourages employees to put their names to allegations because appropriate follow-up questions and investigation may not be possible unless the source of the information is identified. Concerns expressed anonymously will be investigated, but consideration will be given to:

- the seriousness of the issue raised;
- the credibility of the concern; and
- the likelihood of confirming the allegation from attributable sources.

Malicious Allegations – Malicious allegations may result in disciplinary action.

- **Reporting** –

This whistleblowing procedure is intended to be used for serious and sensitive issues. Such concerns, including those relating to financial reporting and unethical or illegal conduct should be reported directly to:

Contact: NARAL Pro-Choice America's Chief Financial Officer

Employment related concerns should continue to be reported through normal channels, i.e. your supervisor or, when appropriate, the Deputy Director – Human Resources.

- **Timing** – The earlier a concern is expressed, the easier it is to take action.

- **Evidence** – Although you are not expected to prove the truth of an allegation, you should be able to demonstrate to the person contacted that there are sufficient grounds for concern.

How the Complaint Will Be Handled

The action taken by NARAL Pro-Choice America in response to a report of concern under this policy will depend on the nature of the concern. The Audit Committee of the NARAL Pro-Choice America's Board of Directors shall receive a report on each complaint and a follow-up report on actions taken.

- **Initial Inquiries** – Initial inquiries will be made to determine whether an investigation is appropriate and, if so, the form it should take. Some concerns may be resolved without the need for investigation.
- **Further Information** – The amount of contact between you and the person or persons conducting the investigation will depend on the nature of the issue and the clarity of information provided. Further information may be sought from or provided to you during the course of the investigation.

Political Coercion, Harassment and Retaliation

NARAL Pro-Choice America embraces diversity and respects each employee's political beliefs and preferences. It is against NARAL Pro-Choice America's policy for anyone to behave in a threatening, harassing, or discriminatory manner toward any other employee with respect to his or her political beliefs or activities. NARAL Pro-Choice America does not permit its officers or managers to coerce employees into supporting or opposing any political candidate, party, or belief. It is a violation of this NARAL Pro-Choice America's policy for any manager to retaliate, threaten to retaliate, or take any adverse action against an employee for his/her support or opposition to any political campaign or party affiliation.