



Whistleblower Policy

Whistleblower Policy To help ensure that TeachUNITED (the “Organization”) complies with the highest standards of financial reporting and lawful and ethical behavior, the Board of Directors establishes the following procedure for the reporting of illegal or unethical conduct in connection with the Organization’s finances or other aspects of its operations, and the retention and treatment of such complaints, including confidential, anonymous submissions received from employees.

Should any person know or have a reasonable belief that persons associated with the Organization plan to engage or have engaged in any conduct which violates a law, or regulation or that constitutes fraudulent accounting or other practices, that person should immediately file a complaint with the CEO (a “Complaint”). Employees of the Organization may submit Complaints on a confidential, anonymous basis. If the Complaint concerns the CEO or the complainant is not comfortable reporting to the CEO, then the complainant should notify the President of the Board of Directors instead. [Issues generally handled by individuals responsible for the Organization’s personnel practices and procedures are not covered by this Policy. Mechanisms for resolving such issues are addressed in separate procedures.]

The CEO or Board President will report all Complaints to the Board of Directors, except that the Complaint will not be shared with an individual who is the subject of the Complaint, prior to the next regularly scheduled meeting. Reports to the Board of Directors will include a copy of the Complaint, its date, nature and source (unless the complainant is an employee who has requested confidentiality and/or anonymity), how it was communicated, whether the CEO or Board President regards the Complaint as credible, and proposals to address it. All credible allegations will be followed up promptly, with further investigation conducted if needed to resolve disputed facts. In conducting its investigations, the Organization will respect an employee’s request for confidentiality and/or anonymity and will strive to keep the identity of other complainants as confidential as possible, consistent with the need to conduct an adequate review and investigation.

The Organization will take appropriate action in response to any Complaints, including, but not limited to, disciplinary action (up to and including termination) against any person who, in the Organization’s assessment, has engaged in misconduct and reporting such misconduct to the relevant civil or criminal authorities as required by law.

The Organization will not knowingly, with the intent to retaliate, take any action harmful to any person, including interference with lawful employment or livelihood, for reporting a Complaint in good faith pursuant to this policy or to law enforcement officers, governmental agencies or bodies, or persons with supervisory authority over the complainant. Likewise, there will be no punishment or other retaliation for providing information regarding a Complaint in good faith



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to, or otherwise assisting in any investigation regarding a Complaint conducted by, the Organization, law enforcement officers, governmental agencies or bodies, or persons with supervisory authority over the complainant. Finally, there will be no punishment or other retaliation for filing a Complaint in good faith, or otherwise participating or assisting in a proceeding filed or about to be filed (with any knowledge of the Organization) regarding any Complaint. An individual who deliberately or maliciously provides false information may be subject to disciplinary action (up to and including termination).