Whistleblower Policy – Approved <u>10/8/2021</u>

The Form 990 instructions state that a whistleblower policy serves three purposes: (1) it encourages staff and volunteers to come forward with credible information regarding illegal practices or violations of adopted policies of the organization; (2) the policy explicitly states that the organization will protect the individual from retaliation for coming forward with the information; and (3) it identifies those staff, board members or outside parties to whom such information can be reported. Thus, this policy intends to meet at least these three purposes in order to answer "yes" to Part VI, Section B, Line 13 of the Form 990.

I. General

The International Focusing Institute ("TIFI") requires its directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of TIFI, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

II. Reporting Responsibility

It is the responsibility of all directors, officers and employees to report ethics violations or suspected violations in accordance with this Whistleblower Policy.

III. No Retaliation

No director, officer or employee, who in good faith reports an ethics violation, shall suffer harassment, retaliation or adverse employment consequences. 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 the employees, officers and directors, and others to raise serious concerns within TIFI prior to seeking resolution outside of TIFI.

IV. Reporting Violations

TIFI has an open door policy and suggests that its employees share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, the Executive Director of TIFI is in the best position to address an area of concern. However, if you are not comfortable speaking with the Executive Director of TIFI or you are not satisfied with the Executive Director's response, you are encouraged to speak with someone on the Board of Directors or International Leadership Council of TIFI whom you are comfortable in approaching.

V. Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation 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.

VI. 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.

VII. Handling of Reported Violations

The Executive Director or member of the Board of Directors who was approached will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.