

## **Whistleblower Policy**

### **General**

Texas Parks & Wildlife Foundation requires 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 TPWF, we must practice honesty and integrity in fulfilling our responsibilities and complying with all applicable laws and regulations. One of the goal's of TPWF is legal compliance (compliance with all applicable laws and regulations) and as part of it's compliance program has established a Whistleblower's Policy to help covered employees report in good faith, suspected violations.

### **Reporting Responsibility**

It is the responsibility of all directors, officers, and employees to observe high standards of business and personal ethics and to report suspected violations in accordance with this Whistleblower Policy.

### **No Retaliation**

No director, officer, or employee who in good faith reports a suspected violation shall suffer harassment, retaliation, or adverse employment consequence. 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 employees and others to raise serious concerns within TPWF prior to seeking resolution outside TPWF.

### **Reporting Violations**

TPWF has an open door policy and suggests that employees share their questions, concerns, suggestions and/or complaints with someone who can address them properly. In most cases, an employee's immediate supervisor is in the best position to address an area of concern. However, if you are not comfortable speaking with your supervisor, or you are not satisfied with your supervisor's response, you are encouraged to speak with anyone in management whom you are comfortable in approaching. For suspected fraud, or when you are not satisfied or uncomfortable with following TPWF's open door policy, individuals should contact the Chairman of the Board directly. It is important to note that complaints can be made with anonymity and are confidential; however this can hinder the investigation and resolution process.

### **Accounting and Auditing Matters**

The Executive Committee of the Board of Directors shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Chairman shall immediately notify the Executive Committee of any such complaint and shall work with the committee until the matter is resolved.

### **Acting in Good Faith**

Anyone filing a complaint must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove to have been made with malice, or that were known to be false by the complainant will be viewed as a serious disciplinary offense.

### **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, consistent with the need to conduct an adequate investigation.

### **Investigation and Resolution**

The Chairman will notify the sender and acknowledge receipt of the reported violation or suspected violation within ten business days. All reports will be promptly investigated, documented in writing, and appropriate corrective action will be taken if warranted by the investigation. The individual filing the complaint will be notified of the resolution promptly after the investigation is completed.