

WHISTLEBLOWER POLICY

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Purpose: To provide a policy that allows for proper whistleblower activities.

Policy: The Catalyst Center for Business & Entrepreneurship (“The Catalyst”) requires directors, officers, volunteers, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of The Catalyst, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility: This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that The Catalyst can address and correct inappropriate conduct and actions. It is the responsibility of all Board members, officers, employees, and volunteers to report concerns about violations of The Catalyst’s code of ethics or suspected violations of law or regulations that govern The Catalyst’s operations.

No Retaliation: It is contrary to the values of The Catalyst’s for anyone to retaliate against any Board member, officer, employee, or volunteer who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of The Catalyst. 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.

Reporting Procedure: The Catalyst has an “open-door policy” and suggests that employees share their questions, concerns, suggestions, or complaints with their supervisor. If an employee is not comfortable speaking with his or her supervisor or an employee is not satisfied with his or her supervisor’s response, such employee is encouraged to speak with the CEO or a Board member. Supervisors are required to report complaints or concerns about suspected ethical and legal violations in writing to The Catalyst’s Compliance Officer, a designated employee or Board member, who has the responsibility to investigate all reported complaints. Employees with concerns or complaints may also submit their concerns in writing directly to their supervisor, CEO, The Catalyst’s Compliance Officer, or other designated person.

Compliance Officer: The Catalyst Operations Manager will serve as the Compliance Officer. The Compliance Officer is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. He/she will advise the CEO and/or the Board of Directors of all complaints and their resolution and will report at least annually to the Chair of the Finance Committee on compliance activity relating to accounting or alleged financial improprieties.

