

WHISTLEBLOWER POLICY

OF THE GEODE FOUNDATION, INC.

Article I – Purpose

The purpose of this **Whistleblower Policy** is to encourage and protect individuals who report **illegal, unethical, or improper conduct** within **The Geode Foundation, Inc.** This policy ensures that whistleblowers can report concerns **without fear of retaliation**.

Article II – Applicability

This policy applies to:

- Board members
- Officers
- Employees
- Volunteers
- Contractors or any person associated with the organization

Article III – Reportable Conduct

A whistleblower may report concerns about:

1. **Financial Misconduct** – Fraud, theft, improper use of nonprofit funds, or falsification of records.
2. **Legal Violations** – Violations of federal, state, or local laws, including IRS and nonprofit regulations.
3. **Unethical Behavior** – Conflicts of interest, discrimination, harassment, or violations of internal policies.
4. **Health and Safety Risks** – Actions endangering employees, volunteers, or the public.

Article IV – Reporting Procedures

1. How to Report

Reports should be made in **good faith** and can be submitted:

- **In Writing** – By email or letter to any **Board Member or designated Compliance Officer**.
- **Verbally** – By requesting a private meeting with the Board or Compliance Officer.

Geode Foundation Policies - Whistleblower

2. Who to Report To

Reports should be made to:

- **Board President:** Support@GeodeChain.com
- **Compliance Officer (if applicable):** Support@GeodeChain.com
- If the complaint involves the Board President, the report should be directed to the **Vice President or another Board member.**

Article V – Investigation & Response

1. Confidentiality

All reports will be kept **confidential to the extent possible**, except when disclosure is required by law.

2. Investigation Process

1. The **Board or Compliance Officer** will acknowledge receipt of the complaint within **7 days**.
2. A **fair and timely investigation** will be conducted.
3. Findings and recommendations will be reviewed by the **Board of Directors**.
4. Corrective actions, if necessary, will be taken.

3. Protection from Retaliation

- The nonprofit **strictly prohibits retaliation** against anyone who makes a **good faith** report.
- Any person found retaliating will face disciplinary action, including **termination or removal from the Board**.

Article VI – False or Malicious Reports

Anyone who knowingly submits **false, misleading, or malicious** complaints may be subject to disciplinary action.

Article VII – Distribution & Compliance

1. This policy will be **distributed to all Board members, employees, and volunteers**.
2. The Board shall review this policy **annually** to ensure compliance with laws and best practices.