

Whistleblower Policy for the Center for Disaster Philanthropy

The Center for Disaster Philanthropy ("CDP") requires its directors, officers, employees and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. It is the responsibility of all directors, officers, employees and volunteers, to report ethics violations or suspected violations in accordance with the CDP Whistleblower Policy.

Purpose

The purpose of this whistleblower policy (this "Policy") is (i) to encourage and enable directors, officers, employees and volunteers to report concerns regarding actual or suspected conduct or practices that may be unlawful or unethical, or violations of CDP's policies, (ii) protect such individuals from retaliation for raising such concerns and (iii) establish policies and procedures for CDP to (a) receive and investigate reported matters and (b) address and correct inappropriate conduct and actions.

Section 1. Reporting Responsibility

All directors, officers, employees and volunteers have the responsibility to report in good faith any concern about actual or suspected violations of law, regulations, ethical standards or CDP's policies (each, a "Violation"). Appropriate subjects to report under this Policy include but are not limited to financial improprieties, accounting or audit matters, ethical violations, or other similar illegal or improper practices, such as:

- Fraud or other financial business-related misconduct;
- Bribery;
- Creation of false contracts;
- Expense claim fraud;
- Theft or embezzlement of CDP resources;
- Misuse of CDP resources for personal gain;
- Disclosure of confidential business information;
- Health and safety violations;
- Conflicts of interest;
- Employee misconduct;
- Criminal activity; or
- Other unethical behavior.

Anyone reporting a Violation must act in good faith and have reasonable grounds for believing the information disclosed indicates a violation of law, regulations, ethical standards and/or CDP policies. Any unfounded allegation that proves to have been made maliciously, recklessly, or knowingly to be false will be viewed as a serious offense and result in disciplinary action including termination of employment or volunteer status.

Other Types of Concerns. This Policy is not intended to address every concern that may arise in the workplace. For example, complaints of a personal nature that do not constitute a Violation or mere disagreements with CDP's business decisions do not constitute whistleblowing. In addition, directors, officers, employees and volunteers should use CDP's existing complaint procedures and mechanisms under other CDP policies to report other issues not covered by this Policy, unless those channels are themselves implicated in wrongdoing. This Policy is not intended to provide a means of appealing the outcomes resulting from those other mechanisms.

Section 2. No Retaliation

Any director, officer, employee or volunteer of CDP who in good faith makes a report or participates in an investigation of a Violation will be protected from retaliation. This protection extends to an individual who reports in good faith, even if the allegations are, after an investigation, not substantiated.

Any individual who retaliates against someone because they, in good faith reported or participated in an investigation of a Violation, will face discipline including termination of employment or volunteer status. Retaliation includes, but is not limited to, the following actions:

- Termination;
- Demotion;
- Denial of promotion;
- Denial of leave or benefits;
- Intimidation; and
- Making threats.

If you believe that an individual who has made a good faith report of a Violation or who has, in good faith, cooperated in the investigation of a Violation is suffering harassment, retaliation or adverse employment consequences, please contact Brenda Camacho, Chief Financial and Operations Officer (the "Compliance Manager").

Section 3. Reporting Procedure

Reporting Procedure. All Violations should be reported in accordance with the following procedures:

- Complaints may be submitted to an employee's immediate supervisor.
- Alternatively, complaints may be submitted in writing to the Compliance Manager.
- If the employee is not comfortable doing so or if the complaint is directly or indirectly related to the conduct of the employee's immediate supervisor or the Compliance Manager, then the employee is encouraged to report their concern by contacting the Chief Executive Officer.
- If the Chief Executive Officer is also included in the complaint, the employee is encouraged to report their concern by contacting the Board Chair of the Board of Director's Executive Committee.
- The complaint should include the name and title of the alleged violator and any evidence that the whistleblower has to support the allegation.

Any supervisor or other person who receives a complaint about a Violation shall notify the Compliance Manager, unless the complaint included the Compliance Manager, in which case such supervisor or other person shall notify the Chief Executive Officer. If the complaint included both the Compliance Manager and Chief Executive Officer, the Board Chair of the Board of Director's [Executive Committee] shall be notified and will manage the investigation.

Investigation. CDP is committed to fully investigating all allegations of misconduct including allowing accused parties to answer the allegations made against them. The Compliance Manager (or if the complaint involves the Compliance Manager, the Chief Executive Officer; or if the complaint involves both the Compliance Manager and Chief Executive Officer, the Board Chair of the Board of Director's [Executive Committee]) shall conduct a prompt and objective investigation of all reported Violations. If deemed necessary in its sole discretion, the Compliance Manager (or if applicable, the Chief Executive Officer or Board Chair, conducting the investigation) may engage legal counsel, accountants or other professionals, including an outside human resources investigation firm, to conduct or assist with the investigation. The Compliance Manager, Chief Executive Officer or Board Chair, as applicable, may delegate the investigation responsibilities to any member of the board of director's Executive Committee, provided that the delegate is not a subject of the reported Violation.

Resolution of Investigation. Once the investigation has concluded, the investigator shall prepare a written report, summarizing the details of the investigation and any recommendations on how to proceed. Based on the report, the Compliance Manager, Chief Executive Officer or Board Chair, as applicable, will make a final decision about appropriate corrective actions to be taken if warranted.

Finding of Misconduct. If an employee or other party subject to the complaint is found to have engaged in misconduct, the employee or such other party will be disciplined up to and including termination. If an employee or such other party is determined to have engaged in criminal conduct, CDP will immediately notify and cooperate with law enforcement in any criminal proceedings that may result.

Accounting and Auditing Matters. The Compliance Manager, Chief Executive Officer or Board Chair, as applicable, shall immediately notify the Finance & Audit Committee of any Violations regarding accounting practices, internal controls, or auditing, and shall work with the Finance & Audit Committee until the matter is resolved.

Contact Details.

Compliance Manager:

Brenda Camacho
C: 240-310-3694



Brenda.camacho@disasterphilanthropy.org

Chief Executive Officer:

Patricia McIlreavy
C:202-294-1821



patricia.mcilreavy@disasterphilanthropy.org

Board Chair:

Tiffany Benjamin



Tbenjamin5@humana.com

Section 4. Confidentiality

CDP encourages anyone reporting a Violation to identify themselves in order to facilitate the investigation of the Violation. However, Violations may be submitted on a confidential and/or anonymous basis by requesting confidentiality in your initial contact with the Compliance Manager, Chief Executive Officer or Board Chair, as applicable. CDP shall take reasonable steps to protect the identity of the whistleblower, and shall keep reports of Violations confidential to the extent possible, consistent with the need to conduct an adequate investigation and requirements of law.

Section 5. Miscellaneous

Employer Right to Amend Policy. CDP reserves the right to amend, delete or revise parts of this Policy at any time.

Document Retention. CDP shall retain any records related to the investigation and resolution of a reported Violation as required by CDP's Document Destruction Policy. All such records are considered privileged and strictly confidential.

Nothing in this Policy prohibits an employee from reporting concerns, making lawful disclosures, or communicating with any governmental authority about conduct that the employee believes violates any laws or regulations.

This Policy was adopted by the CDP's Board of Directors at its meeting on June 8th, 2023.

Section 6. Acknowledgment

I, _____ (Name), acknowledge that on _____ (Date), I received a copy of CDP's Whistleblower Policy and that I read it and understood it.