WHISTLEBLOWER POLICY  
Attachment I

1. Purpose.

TREASURE COAST FOOD BANK, INC., requires board Members, committee Members and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities, and all directors, committee Members and employees to comply with all applicable laws and regulatory requirements.

2. Reporting Responsibility.

TREASURE COAST FOOD BANK, INC. seeks to have an “Open Door Policy” and encourages board Members and employees to share their questions, concerns, suggestions, or complaints regarding the TREASURE COAST FOOD BANK, INC. and its operations with someone who can address them properly. In most cases, a board Member or committee Member should present his or her concerns to the President of the Board. The Director is generally in the best position to address an employee’s area of concern. However, if a board Member is not comfortable speaking with the Board President or is not comfortable with the Board President’s response, or if an employee is not comfortable speaking with the Director or if the employee is not satisfied with the Director’s response, the board Member, committee Member or employee is encouraged to speak with anyone on the Board whom the employee is comfortable in approaching, or to directly contact the TREASURE COAST FOOD BANK, INC. outside legal counsel, whose contact information can be obtained from the Director.

3. No Retaliation.

No board Member, committee Member, or employee who in good faith reports a violation of a law or regulation requirement 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 persons to raise serious concerns within TREASURE COAST FOOD BANK, INC. prior to seeking resolution outside TREASURE COAST FOOD BANK, INC. (Attachment I).

4. Compliance Officer.

The President and the Board of Directors, in coordination with the executive committee, will act as TREASURE COAST FOOD BANK, INC.’s Compliance Officer. The Compliance Officer is responsible for investigating and resolving all employee complaints and allegations concerning violations of the Principles and/or Code. The Board President or his or her designee will take on the Compliance Officer role if the complaint involves the Director. If
the complaint involves both the Director and Board President, outside legal counsel [Or another board Member] will carry out the functions of the Compliance Officer.

5. **Accounting and Auditing Matters.**

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

6. **Requirement of Good Faith.**

Anyone filing a complaint concerning a violation or suspected violation of the law or regulation requirements 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.

7. **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.

8. **Handling of Reported Violations.**

The Compliance Officer, or the person responsible for carrying out the Compliance Officer’s role with respect to a reported or suspected violation, will acknowledge receipt of the reported violation or suspected violation by writing a letter (or e-mail) to the complainant within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.