



## **Whistleblower Policy**

Save The Horses requires directors, officers, volunteers and/or employee(s) to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of Save The Horses, 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 Save The Horses can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, volunteers and/or employees to report concerns about violations of Save The Horses code of ethics or suspected violations of law or regulations that govern Save The Horses operations.

### **No Retaliation**

It is contrary to the values of Save The Horses 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 Save The Horses. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including separation from the organization.

### **Reporting Procedure**

Save The Horses has an open-door policy and suggests that volunteers or employees share their questions, concerns, suggestions or complaints with any member of the Board. If you are not comfortable speaking with a Board member, or you are not satisfied with the response, you are encouraged to speak with the person designated to handle legal matters for Save The Horses. Members and managers are required to report complaints or concerns about suspected ethical and legal violations in writing to the Save The Horses' designated Legal Manager, who has the responsibility to investigate all reported complaints. Volunteers or others with concerns or complaints may also submit their concerns in writing directly to the Compliance Manager and/or to the Executive Director.

### **Legal Manager**

The Save The Horses Legal Manager is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Legal Manager will advise the Executive Director and/or the Board of Directors of all complaints and their resolution and will report at least annually to the Board and/or Audit Committee members on compliance activity relating to accounting or alleged financial improprieties.

### **Accounting and Auditing Matters**

Save The Horses Compliance Manager or the Legal Manager shall immediately notify the Audit /Finance Committee of any concerns or complaint regarding corporate accounting practices, internal controls or auditing and work with the committee until the matter is resolved.

**Acting in Good Faith**

Anyone filing a written complaint concerning a violation or suspected violation 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.

**Confidentiality**

Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

**Handling of Reported Violations**

Save The Horses' Legal Manager will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

Policy considered and approved by the Board of Directors on October \_\_\_, 2020.

"Save the Horses" is the registered Trade Name of Horse Rescue, Relief and Retirement Fund, Inc.