

# WHISTLE BLOWER POLICY

## General

CREATE requires its directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of CREATE, we must practice honesty and integrity in fulfilling our responsibilities and complying with all applicable laws and regulations.

The matters which should be reported under this policy include suspected fraud, theft, embezzlement, accounting or auditing irregularities, bribery, kickbacks, misuse of our assets or suspected regulatory, compliance, or ethics related issues, concerns or violations.

These policies are not a vehicle for reporting violations of CREATE's human resources policies, problems with co-workers or managers, or for reporting issues related to alleged employment discrimination or sexual or any other form of unlawful harassment, all of which should be dealt with in accordance with the EEO policies of this manual.

## Reporting Responsibility

It is the responsibility of all directors, officers and employees to report violations or suspected violations of high business and personal ethical standards and/or applicable legal requirements (violations) in accordance with this whistle blower policy.

## No Retaliation

No director, officer or employee who in good faith reports a violation 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 whistle blower policy is intended to encourage and enable employees and others to raise serious concerns within CREATE prior to seeking resolution outside CREATE.

## Reporting Violations

Questions, concerns, suggestions or complaints regarding the ethical and legal standards noted above should be addressed directly to the President of the Board of Directors.

## President of the Board of Directors

The Chair of the Board of Directors is responsible for investigating and resolving all reported complaints and allegations concerning the ethical and legal standards noted above and shall advise the Executive Director and the Executive Committee of all such complaints and allegations. The Chair of the Board of Directors is required to report to the full Board of Directors at least annually on compliance activity.

## Accounting and Auditing Matters

The Executive Committee shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing brought to its attention. The Chair of the Board of Directors shall immediately notify the Board of Directors of any such complaint and work with the Executive Director and the Board until the matter is resolved.

## Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation of the ethical and legal standards noted above must act in good faith and have reasonable grounds for believing the information disclosed may indicate a violation of such standards. 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

The Chair of the Board of Directors will notify the sender and acknowledge receipt of the reported violation or suspected violation within five (5) business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation. The complainant will be notified in writing of our decision.