

Whistleblower Policy of

READING FOR KICKS

A California Nonprofit Public Benefit Corporation

ARTICLE 1 GENERAL

- a. READING FOR KICKS (“Organization”) Code of Ethics (“Code”) requires directors, officers, and members of committees with governing board delegated powers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As directors, officers, and members of committees with governing board delegated powers of the Organization, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.
- b. This Whistleblower Policy is intended to encourage and enable directors, officers, or members of committees with governing board delegated powers to raise serious concerns within the Organization prior to seeking resolution outside the Organization.

Article 2 PURPOSE

READING FOR KICKS encourages its directors, officers, and committee members to maintain high ethical standards. This whistleblower policy is meant to provide a confidential and effective means for reporting suspected violations of the law. Accordingly, all directors, officers, or members of committees with governing board delegated powers of Reading for Kicks will be protected from any disadvantage caused by raising legitimate concerns and shall be protected retaliation in any form.

ARTICLE 3 REPORTING RESPONSIBILITY

It is the responsibility of all directors, officers and employees to comply with the Code and to report violations or suspected violations in accordance with this Whistleblower Policy. If an individual reasonably believes that some practice of READING FOR KICKS , a member of the board of directors or a board committee, an officer, or another individual or entity with whom READING FOR KICKS has a business relationship is in violation of the law, the employee must file a written complaint with the Board President and/or the Compliance Officer.

ARTICLE 4 NO RETALIATION

- a. No director, officer, or member of a committee with governing board delegated powers who in good faith reports a violation of the Code shall suffer harassment, retaliation or adverse employment consequence whether or not the allegation turns out to be correct. A director, officer, or member of a committee with governing board delegated powers who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including removal from office.

- b. READING FOR KICKS will not retaliate against any director, officer, or member of a committee with governing board delegated powers who discloses or threatens to disclose to another director, officer, or member of a committee with governing board delegated powers, or a public body, any activity, policy, or practice of READING FOR KICKS that that person reasonably believes is in violation of a law, or a rule or regulation mandated pursuant to law, or is in violation of a clear mandate or public policy concerning the health, safety, welfare, or protection of the environment.

ARTICLE 5 REPORTING VIOLATIONS

The Code addresses the Organization's open door policy and suggests that directors, officers, or members of committees with governing board delegated powers share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, another director, officer, or member of a committee with governing board delegated powers is in the best position to address an area of concern. They are required to report suspected violations of the Code of Conduct to the Organization's Compliance Officer, who has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or when you are not satisfied or uncomfortable with following the Organization's open door policy, individuals should contact the Organization's Compliance Officer directly.

ARTICLE 6 COMPLIANCE OFFICER

The Organization's Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning violations of the Code and, at his discretion, shall advise the President and/or the audit committee. The Compliance Officer has direct access to the audit committee of the board of directors and is required to report to the audit committee at least annually on compliance activity. The Organization's Compliance Officer is the chair of the audit committee.

ARTICLE 7 ACCOUNTING AND AUDITING MATTERS

The audit 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 audit committee of any such complaint and work with the committee until the matter is resolved.

ARTICLE 8 ACTING IN GOOD FAITH

Anyone filing a complaint concerning a violation or suspected violation of the Code is not required to prove the truth of an allegation, but must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Code. 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.

ARTICLE 9 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.

ARTICLE 10 HANDLING OF REPORTED VIOLATIONS

- a. The Compliance Officer will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.
- b. The Board President will contact the complainant within 10 business days and acknowledge the reported violation was received. The complainant will be notified about what actions will be taken. If no further action or investigation is to follow, an explanation for the decision will be given to the complainant.

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My signature below indicates my receipt and understanding of this policy.

I also verify that I have been provided with the opportunity to ask questions about the policy.

I understand that the Compliance Officer for READING FOR KICKS is:

Compliance Officer

Phone

*

Employee Signature

Date