

WHISTLEBLOWER POLICY

The Board of Directors of Wayfinder Family Services has adopted the following policies and procedures you may follow if you believe that any laws or Wayfinder Family Services policies relating to Wayfinder Family Services accounting, auditing, or financial matters are being or have been violated. Please note that other subjects on which Wayfinder Family Services has existing complaint mechanisms should be raised under those separate mechanisms, such as raising matters of alleged discrimination or harassment via Wayfinder Family Services' human resources channels, unless those channels are themselves implicated in the wrongdoing.

Encouragement of Reporting

It is Wayfinder Family Services' policy to encourage staff and volunteers to come forward with credible information on illegal or unethical conduct without regard to the identity or position of the suspected offender, and protect the reporting person from retaliation. It is the intent of Wayfinder Family Services to adhere to all laws and regulations that apply to Wayfinder Family Services and the underlying purpose of this policy is to support Wayfinder Family Services' goal of legal compliance.

Protection from Retaliation

Wayfinder Family Services will not tolerate retaliation in any form against staff or volunteers for making good faith complaints, reports or inquiries under this policy or for participating in a review or investigation under this policy, even if the allegations prove to be mistaken. This protection extends to those whom are *perceived* to have engaged in such activity, even if they have not actually done so. Moreover, Wayfinder Family Services will not tolerate retaliation in any form against staff or volunteers whose family members have engaged in—or are perceived to have engaged in—such activity. Nor will Wayfinder Family Services tolerate retaliation against individuals for refusing to participate in an unlawful activity. Any employee or volunteer who believes he or she has been subjected to retaliation in violation of this policy should comply with the procedures below.

Where to Report

Complaints or concerns relating to auditing, accounting, or financial matters may be reported internally through Wayfinder Family Services' reporting mechanisms or externally to a government or law enforcement agency, such as by calling the Attorney General's Whistleblower Hotline at (800) 952-5225. Complaints can be made internally by calling Wayfinder Family Services' Complaint Hotline at report (855) 550-0651 or by submitting а via the website (www.wayfinderfamilyservices.ethicspoint.com). Although you are encouraged to provide your name and contact information so that Wayfinder Family Services can better respond to any concerns, your report to the Hotline or website may be made anonymously if you prefer. Reports to the Hotline or website are handled via a third party outside of Wayfinder Family Services. A report is then forwarded to the appropriate Board committee and a copy to our President/CEO. However, complaints concerning our President/CEO will not be forwarded to the President/CEO.

Wayfinder Family Services will conduct a prompt and objective review or investigation, and will take disciplinary or other action as appropriate. Any complaints, reports, inquiries, and related investigations will be kept confidential to the extent possible given the need to conduct an adequate investigation.