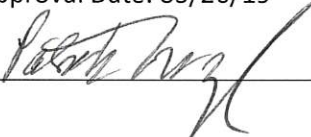




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WHISTLEBLOWER POLICY

Trustees, officers, employees and volunteers of I Am Boundless, Inc. and its affiliated companies (referred to collectively as "Boundless") must observe high standards of business and personal ethics in the conduct of their duties and responsibilities within Boundless. Representatives of Boundless must practice honesty and integrity and must comply with all applicable laws and regulations in fulfilling their work responsibilities.

The purpose of this Whistleblower Policy is to create an ethical and open work environment, to ensure that Boundless has a governance and accountability structure that supports its mission, and to encourage and enable trustees, officers, employees and volunteers of Boundless to raise serious concerns about the occurrence of illegal or unethical actions within Boundless before turning to outside parties for resolution.

Notwithstanding anything contained in this Whistleblower Policy to the contrary, this Whistleblower Policy is not an employment contract and does not modify the employment relationship between Boundless and any of its trustees, officers, employees or volunteers. Nothing contained in this Whistleblower Policy provides any trustee, officer, employee or volunteer of Boundless any additional rights or causes of action not otherwise available under applicable law.

Reporting Responsibility

All trustees, officers, employees and volunteers of Boundless have a responsibility to report any action or suspected action taken within Boundless that is illegal, unethical or violates any adopted policy of Boundless ("Violations").

Anyone reporting a Violation must act in good faith and have reasonable grounds for believing that the information shared in the report is accurate and indicates that a Violation has occurred. A person who makes a report does not have to prove that a Violation has occurred. However, any report which the reporter has made maliciously, or any report which the reporter has good reason to believe is false, will be viewed as a serious disciplinary offense.

No Retaliation

No one who in good faith reports a Violation, or who, in good faith, cooperates in the investigation of a Violation shall suffer harassment, retaliation or adverse employment consequences. Any individual within Boundless who retaliates against another individual who has reported a Violation in good faith, or who, in good faith, has cooperated in the investigation of a Violation is subject to discipline, including termination of employment or volunteer status.

Any trustee, officer, employee or volunteer who believes that an individual who has made a good faith report of a Violation, or who has, in good faith, cooperated in the investigation of a Violation is suffering harassment, retaliation or adverse employment consequences, must report that information to the Director of Human Resources.

Reporting Process

Trustees, officers, employees, and volunteers should address their concerns about a Violation to any person within Boundless who can properly address those concerns. In most cases, the direct supervisor of an employee or volunteer is the person best suited to address a concern. However, if an employee or volunteer is not comfortable speaking to a supervisor, or is dissatisfied by a supervisor's response, the employee or volunteer is encouraged to speak to the Director of Human Resources, or to anyone in management the employee or volunteer feels comfortable approaching, or directly to the Director of Compliance and Risk Management.

Boundless encourages anyone reporting a Violation to identify himself or herself when making a report in order to facilitate the investigation of the Violation. However, reports addressed to an individual within Boundless may be submitted on a confidential basis and reports may be submitted to the Director of Human Resources anonymously.

The Director of Human Resources shall investigate all Violation reports that he/she receives. The Human Resources Director also has a responsibility to inform the Director of Compliance and Risk Management of all reports of Violations received by the Human Resources Director, as well as the disposition of those reported Violations.

Director Of Compliance and Risk Management

A supervisor, manager, officer or a trustee is required to notify the Director of Compliance and Risk Management of every reported Violation. The Director of Compliance and Risk Management will notify the sender and acknowledge receipt of a report of Violation within five (5) business days, but only to the extent the sender's identity is disclosed or a return address is provided.

Other than reported Violations investigated by the Director of Human Resources, the Director of Compliance and Risk Management is responsible for promptly investigating all reported

Violations and for causing appropriate corrective action to be taken if warranted by the investigation.

The Finance Committee of the Board of Trustees is responsible for addressing all reported concerns or complaints of Violations relating to corporate accounting practices, internal controls or auditing. Therefore, the Director of Compliance and Risk Management must immediately notify the Finance Committee of any such concern or complaint. In addition, if the Director of Compliance and Risk Management deems it appropriate, he/she may advise the President and CEO and/or the Finance Committee of any other reported Violations.

The Director of Compliance and Risk Management has direct access to the Board of Trustees and is required to report to the Board of Trustees at least annually concerning Whistleblower Policy compliance activity.

