

3.12 WHISTLEBLOWER POLICY

It is the intent of the Winthrop Rockefeller Foundation to adhere to all laws and regulations that apply to the organization and the underlying purpose of this policy is to support the organization's goal of legal compliance. The support of all employees is necessary to achieving compliance with various laws and regulations.

If any employee reasonably believes that some policy, practice, or activity of the Foundation is in violation of law, a written complaint should be filed by that employee with the President & CEO or Board President. The Foundation will not retaliate against an employee who in good faith has made a protest or raised a complaint against some practice of the Foundation, or of another individual or entity with whom the Winthrop Rockefeller Foundation has a business relationship, on the basis of a reasonable belief that the practice is in violation of law, or a clear mandate of public policy.

The Foundation will not retaliate against employee who discloses or threatens to disclose to a supervisor or a public body, any activity, policy, or practice of the Foundation that the employee 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 of public policy concerning the health, safety, welfare, or protection of the environment.

3.13 ANTI-HARASSMENT POLICY

It is the policy of the Foundation to provide a workplace free from harassment. Harassment is a form of employee misconduct. All employees must be allowed to work in an environment free from harassment based on race, color, religion, sex or gender, sexual orientation, genetic information, national origin, age, handicap or disability, marital status, or military status, or any other legally protected status.

Harassment includes any verbal or other conduct that demeans, insults or intimidates an employee or group of employees because of their race, color, religion, sex or gender, sexual orientation, genetic information, national origin, age, handicap or disability, marital status or military status. Prohibited conduct includes, but is not limited to, jokes, labels, names, verbal abuse, ridicule, or stories offensive to a particular group of persons.

Because of the Foundation's strong disapproval of offensive or inappropriate sexual behavior at work, all employees must avoid any action or conduct which could be viewed as sexual harassment, including:

- Unwelcome sexual advances, including:
 - Unwelcome requests for dating
 - The request for sexual acts or favors
- Verbal abuse of a sexual nature, including:
 - Sexually related comments or joking
 - Graphic or degrading sexual comments about another's appearance
- Nonverbal abuse of a sexual nature, including:
 - Suggestive or insulting noises, leering, whistling, or making obscene gestures, e.g., giving someone the finger
 - The display of sexually suggestive objects or pictures
- Physical conduct of a harassing nature, including inappropriate touching or brushing the body of another
- Any other verbal, nonverbal or physical conduct of a harassing nature.

If you believe you have been the subject of harassment by anyone, including supervisors, officers, co-workers or third parties, you should immediately report the problem to your supervisor or the Chief Operating and Financial Officer. A complaint involving your supervisor should be reported to the Chief Operating and Financial Officer immediately. "Immediately" normally means the same day of the alleged harassment. The failure to make a timely report of alleged harassment may be a factor used in determining the merits of the allegation.

Your complaint will be promptly investigated. You will be advised of the findings and conclusions. All employees are expected to cooperate fully in such investigations. To the extent feasible, all internal investigations and/or actions taken to resolve complaints of harassment will be confidential.