

FoodRecovery.org

Whistleblower Protection Policy

(Policy Approved by MEANS Database Inc. DBA FoodRecovery.org on May 1st, 2024)

MEANS Database Inc. DBA FoodRecovery.org (“the Company”) requires its Board Members, Directors, Managers, Employees, Contractors and Volunteers to maintain a high standard of practice regarding professional and personal ethics when executing their responsibilities. As representatives of the FoodRecovery.org brand, all members must conduct themselves honestly and comply with all laws and regulations to pursue this. This policy outlines procedures for handling employee complaints, as well as a confidential way for employees to report financial or other types of mismanagement.

Definitions

- **COMPLAINANT:** Board Member, Director, Manager, Employee, Contractor, or Volunteer raising a formal complaint to the Compliance Officer
- **SENIOR STAFF:** Collective of Directors at The Company
- **REPRESENTATIVE:** Board Member, Director, Manager, Employee, Contractor, or Volunteer at the Company
- **ACCOUNTING COMMITTEE:** Including or consisting of any Board Members, Directors, independent third parties designated by FoodRecovery.org Senior Staff or the Board to address formal complaints
- **COMPLIANCE OFFICER:** Annually rotating role held by any Board Member, Director, Manager, or third party designated by the Senior Staff

Reporting Responsibility

Our Whistleblower Protection Policy encourages all parties to raise concerns internally and enables them to do so. This will allow FoodRecovery.org to address concerns directly, and correct any forms of inappropriate conduct. All parties have a responsibility to report any concerns about violations of FoodRecovery.org’s code of ethics or any law or regulation governing FoodRecovery.org’s operations.

Reporting Process

The Company encourages Representatives to share any questions, concerns, or suggestions with their immediate supervisor. If you are uncomfortable discussing this with a supervisor or are unsatisfied with the response, you are encouraged to speak with the Executive Director or a Board Member. Supervisors and Managers are required to report all formal good-faith complaints

about suspected violations in writing to the Company's Compliance Officer, who has the explicit duty to investigate all reports of suspected violations. Members with concerns or complaints may also submit their concerns in writing directly to their supervisor, the Executive Director, or The Board of Directors. The Compliance Officer will notify the person who submitted a complaint with an acknowledgment receipt of the reported potential violation. All reports will be promptly and diligently investigated by the Compliance Officer and raised to the bodies followed by appropriate corrective action if the report is deemed accurate.

Compliance Officer

The Company's Compliance Officer is responsible for ensuring that all complaints regarding unethical or illegal conduct are investigated and resolved. The Compliance Officer will advise the Executive Director and/or Board Members of all complaints and resolutions. The Compliance Officer will report once annually to the Accounting Committee and the Board on compliance activity relating to accounting and/or alleged financial impropriety.

If the complaint was filed about the Compliance Officer, an independent third party will be selected by the Senior Staff to take on the responsibilities of the Compliance Officer.

The Compliance Officer agrees to commit to confidentiality or face the penalties under the Non-Retaliation clause outlined in this document.

Once per year, during a quarterly Board Meeting, a new Compliance Officer is selected from the pool of candidates.

Accounting Matters

The Company's Accounting Committee is responsible for determining a course of action to remediate alleged noncompliance with any and all federal and state finance laws.

The Compliance Officer shall immediately notify the Executive Director and the Accounting Committee of any concerns or complaints regarding corporate accounting practice, internal controls, auditing and work with the Accounting Committee until the investigation is complete and a resolution for course of action is reached.

If a complaint alleges a violation involving the Executive Director or a member of the Accounting Committee, then only the uninvolved parties are notified.

If an Accounting Committee member is alleged to be involved in the violation, an alternate member will be selected from either the Board of Directors, the Senior Staff of the Company, or an independent third party with a background in compliance.

All members of the Accounting Committee agree to commit to confidentiality or face the penalties under the Non-Retaliation clause outlined in this document.

Accounting Committee Selection

The Accounting Committee consists of three persons selected at random from the pool of Senior Staff and Board Members.

Once per year, during a quarterly Board Meeting, a new Accounting Committee is selected from the pool of candidates.

Good Faith

The Complainant, who files a written complaint concerning a violation or suspected violation, must act in good faith and have reasonable grounds to believe the information they disclose suggests a violation. Any unsubstantiated allegations that prove to have been made maliciously or knowingly false will be approached as a serious disciplinary offense.

Confidentiality

Violations or suspected violations may be submitted confidentially by any Company Representative. Reports of violations or suspected violations will be kept confidential between the Compliance Officer and the Accounting Committee while conducting an appropriate investigation into the alleged violation.

This clause does not apply to mandatory reporting to a law enforcement agency (e.g. abuse).

Non-Retaliation

It is contrary to the Company's core principles for anyone to retaliate against any Complainant, including but not limited to a complaint of suspected violation of law, discrimination, suspected fraud, or any suspected violation of regulations governing the Company's operations. Any Representative at the Company who retaliates against a report following this description is subject to disciplinary action up to and including termination of employment or removal of duties, where applicable.