Worldwide Vets Incorporated

Whistleblower Policy

EIN: 92-3351721

Article I — Purpose

The purpose of this Whistleblower Policy is to encourage employees, officers, volunteers, and directors of *Worldwide Vets Incorporated* (the "Organization") to report suspected illegal, unethical, or improper conduct without fear of retaliation. This policy is intended to:

1. Promote compliance with applicable laws and regulations;
2. Encourage ethical behavior;
3. Protect the Organization's assets and reputation; and
4. Ensure adherence to IRS rules for 501(c)(3) organizations.

Article II — Scope

This policy applies to all:

- Employees (full-time, part-time, temporary)
- Officers and directors

- Volunteers and interns
- Committee members with board-delegated powers

Collectively referred to as **“covered persons”**.

Article III — Reporting Responsibility

All covered persons have a responsibility to report:

- Suspected violations of federal, state, or local laws;
- Suspected violations of the Organization’s policies, including but not limited to fraud, theft, misuse of assets, or abuse of charitable funds;
- Actions that create a substantial and specific danger to public health or safety;
- Any suspected violations of the Organization’s Code of Ethics or Conflict of Interest Policy.

Article IV — Reporting Procedures

1. **Reporting Channels**
   Covered persons are encouraged to report concerns promptly through one of the following channels:
   - Immediate supervisor or manager (unless the supervisor is involved in the suspected misconduct)
   - Executive Director or Chief Executive Officer
   - Chairperson of the Board of Directors
2. **Anonymous Reporting**
   Reports may be submitted anonymously via written letter or secure email to the Board Chair or designated compliance officer.

3. **Required Information**
   Reports should include, when possible:
   - Description of the alleged misconduct
   - Names of individuals involved
   - Dates and locations of events
   - Supporting evidence

Article V — Anti-Retaliation

The Organization strictly prohibits retaliation against any covered person who in good faith reports misconduct or participates in an investigation. Retaliation includes, but is not limited to:

- Termination, demotion, suspension, or denial of benefits
- Threats or intimidation
- Harassment or any form of discrimination

Covered persons who believe they have been subjected to retaliation should immediately report it to the Board Chair or Executive Director.

Article VI — Investigation Procedures

1. **Responsibility**
   The Board of Directors or a designated compliance officer shall oversee all investigations.
2. **Investigation Steps**
   - Acknowledge receipt of the report to the reporting individual (unless anonymous)
   - Gather relevant facts and evidence
   - Interview witnesses and the accused, if appropriate

- Maintain confidentiality to the fullest extent possible
- Document the investigation, findings, and recommendations

3. **Action and Resolution**
   The Board or Executive Director shall take appropriate corrective or disciplinary action, which may include:
   - Reprimand or warning
   - Suspension or termination of employment or volunteer duties
   - Referral to law enforcement or regulatory authorities, if warranted

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Article VII — Confidentiality

All reports and investigations shall be handled confidentially. Disclosure of information will be limited to those with a legitimate need to know in order to conduct the investigation or take corrective action.

Article VIII — Recordkeeping

The Organization shall maintain a written record of all whistleblower reports, investigations, findings, and corrective actions for a minimum of **seven (7) years**, in accordance with IRS and legal requirements.

Article IX — Communication and Training

- This policy shall be distributed to all employees, officers, volunteers, and directors.
- Training on whistleblower rights and responsibilities shall be included in onboarding and periodically for all covered persons.