

The Denan Project, Inc. (TDP)

Whistleblower and Non-Retaliation Policy

I. General

TDP's Code of Ethics requires directors, officers, employees, and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As representatives of TDP, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

II. Reporting Responsibility

It is the responsibility of all directors, officers, employees, and volunteers to comply with and to report violations or suspected violations of the Code of Ethics ("Code"), TDP policies, or laws in accordance with this policy.

III. No Retaliation

No director, officer, employee, volunteer, or contractor who in good faith reports a violation of the Code, TDP policies, or law shall suffer harassment, retaliation or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within TDP prior to seeking resolution outside TDP.

IV. Reporting Violations

Directors, officers, employees, and volunteers should share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, employees and volunteers should report to the TDP President. However, if an employee or volunteer is not comfortable speaking with the President or is not satisfied with the response, that employee or volunteer is encouraged to report to any officer of the Board.

V. Acting in Good Faith

Any good faith report, concern or complaint is fully protected by this policy, even if the report, question or concern is, after investigation, not substantiated. Anyone filing a complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Code, TDP policy, or law. Any allegations that prove not to be substantiated and have been made maliciously or with knowledge that they were false will be treated as a serious disciplinary offense.

VI. Confidentiality

Upon the request of the complainant, TDP will use its best efforts to protect the confidentiality of the complainant for any good faith report. Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

VII. Handling of Reported Violations

All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation. The complainant will be informed that follow-up has or is occurring within two weeks after the President or board officer has received the complaint or report. The Executive Committee shall be informed of all such complaints or reports.

History of policy:

Adopted by Board of Directors on _____