

Resolution of the Board of Directors

WHISTLEBLOWER PROTECTION POLICY

**Sauftt, Inc.**



INTRODUCTION

Sauftt, Inc. is a not-for-profit organization established to serve the public good. Our directors, officers, employees, interns and volunteers must observe high, though general, standards of ethics and conduct while exercising their duties and fulfilling their official responsibilities. All are required to adhere to our Bylaws and follow published policies, as well as applicable laws and regulations. The members of the Board of Directors, the executive director and other employees who have been granted powers of the Board are bound by specific duties identified in the Bylaws.

Our Whistleblower Protection Policy has been adopted to protect this company from corruption and unlawful activities, especially regarding our Conflict of Interest Policy and relevant laws. Because reporting the improper conduct of others, particularly those in positions of power, can be difficult, we have taken care to develop procedures that protect those who are willing to step forward. When done in good faith, reporting suspected violations is an honorable and appreciated contribution to this company. We thank you in advance for vigilance and assistance in preserving the integrity of this institution.

YOUR RESPONSIBILITY TO REPORT

Whether you are a member of the Board, an employee, an intern or a volunteer, you have agreed to preserve the integrity of this organization and it is your duty to report

any thing that you have observed that causes you to believe that a violation of our Conflict of Interest Policy, or any state of federal laws has taken place in the past or is happening at present.

ACTING IN GOOD FAITH

When you report a violation, you must do so in good faith and without malicious intent. Malevolent reporting is a serious offense and will result in disciplinary action. This is different from submitting a suspected violation when you have reasonable evidence that improper conduct has occurred.

CONFIDENTIALITY

Your conversations with our compliance officer (see below) and any report you submit will be held in strict confidence to every degree possible. If it is absolutely necessary to involve your name or any other information about you, you will be notified in advance.

NO RETALIATION

Any retaliation against a whistleblower will absolutely not be tolerated. Any person found to have engaged in an act of retaliation, even a minor instance, will face severe disciplinary action, up to and including dismissal. Whistleblowers are to be respected for fulfilling the duty each and every member of our corporate community is expected to uphold.

OUR COMPLIANCE OFFICER

Our compliance officer serves as a volunteer appointee of the Board of Directors. He or she is an unbiased intermediary, whose only allegiance is to the organization and not to any board member or any person working for, or with, this company. This person has the skills and experience to handle matters of this kind, and has been selected for this position because of their approachability and wiliness to listen to, and to assist, anyone filing a complaint.

The compliance officer is charged with researching every registered complaint involving unethical or illegal conduct and adjudicated each case according to protocol, to the best of his or her ability, using available resources. Upon reaching a determination of each case, the compliance administrator will report complaint and the compliance administrator's findings to the executive director and to the executive committee of the Board of Directors.

The current compliance officer's name and contact information is continually updated in Saufft, Inc.'s Personnel Handbook and is posted in easily accessible corporate venues.

HOW TO REPORT A VIOLATION

We recognize that reporting a suspected violation can be a sensitive matter, therefore our reporting procedure is simple and flexible. Here is what you should do:

- First, without engaging in any inappropriate conduct yourself, seek out factual information that will either substantiate or alleviate your concerns.
- To the degree that you feel comfortable, ask for the advice of any supervisor or the executive director. It is also acceptable to contact the compliance officer and share your questions.
- Next prepare a written summary of everything you know, including specifically your concerns and your evidence. Include your name and contact information.
- Finally, make yourself available for a question and answer session with the compliance officer. You will be a vital resource in their investigation.

MATTERS OF FINANCE AND INTERNAL CONTROLS

Saufft, Inc.'s compliance officer is required to immediately report all complaint reports regarding matters of accounting, finance, internal control violations or auditing to our Treasurer. Saufft, Inc.'s Treasurer will assist the compliance officer in his or her investigation until it has been completed, making sure that all available evidence and pertinent materials are accessible to the compliance officer.

HOW WE WILL HANDLE REPORTED VIOLATIONS

There is a specific sequence of events that must occur with each case that is reported, as follows.

- A complaint is submitted to the compliance officer.
- The compliance officer provides a confirmation of receipt of the complaint to the person who submitted it.
- The compliance officer reviews all of the submitted information and gathers all additional evidence that is possible and will make a judgement as to whether what has been reported is a violation or not.
- The compliance officer will arrange a confidential call with the person who submitted the case, to thank them for their service, and to advise them of whether a violation was found.

- If the complaint was not made against a member of the executive committee, then the compliance officer will submit all materials pertaining to the case to the executive committee of the Board of Directors and a notice of the particulars and the findings of the case to the executive director. The executive committee will then make a determination as to how to proceed if necessary, to preserve the organization's not-for-profit status.
- If a member of the executive committee is party to the complaint, then the compliance officer will submit all materials pertaining to the case to the executive director and will submit a notice of the particulars and findings of the case to the executive committee. The executive committee will then schedule a presentation of the case, by the executive director, to the entire Board of Directors for their action.
- The executive committee will notify the compliance officer of any action taken by the executive committee or the Board of Directors.
- The compliance officer will follow up with the person who submitted the complaint, advising them of any actions of the executive committee or the Board of Directors.
- Upon completion of this process, the compliance officer will prepare a final written report to be submitted to the secretary of the corporation. A copy will also be sent to the executive director.
- The secretary of the corporation will preserve the report as part of the corporation's official records, according to his or her duty as prescribed in the Bylaws of the corporation.

APPROVAL BY THE BOARD OF DIRECTORS

This Whistleblower Protection Policy has been approved by Board of Directors of Sauftt, Inc.

____ [Lisa Norris – signature on file] _____ Date: 2/1/2018
 (Name)
 Secretary, Board of Directors, Sauftt, Inc.