



## CO-IMPACT PHILANTHROPIC FUNDS, INC.

### Whistleblower Policy

Adopted as of 17 May 2022

As stewards of the public trust, all directors, officers, and employees of Co-Impact Philanthropic Funds, Inc. ("Co-Impact") are expected to ensure that Co-Impact and the individuals associated with it comply with high standards in financial accounting and reporting, and engage in lawful and ethical behavior. This policy (the "Policy") is intended to remind these individuals of this expectation, to encourage all to report any concerns about possible violations, to lay out procedures for reporting and investigating complaints, and to describe the protections afforded under the Policy.

Co-Impact's Board of Directors (the "Board"), or an authorized committee thereof, will oversee this Policy. The Board designates the Chief Executive Officer and Chief Operating Officer of Co-Impact (the "CEO" and "COO"), under the direction of the Board or an authorized committee thereof, to administer this Policy on its behalf and to report to the Board concerning such administration.

#### 1. Complaints

If any director, officer, advisory board member, or employee knows or has a reasonable belief that persons associated with Co-Impact have engaged or plan to engage in illegal or unethical conduct in connection with Co-Impact's financial resources or operations, such person is expected to file a complaint immediately.

#### 2. Procedure for Filing Complaints

Complaints may be reported on a confidential, anonymous basis, orally or in writing, giving as much detail as possible, to the CEO or COO. Contact information is appended to the Policy. If the CEO or COO is the subject of the complaint, the complaint may be reported to the other individual or to the Chair of the Board (the "Alternate"). Upon receiving an oral complaint, the CEO, COO, or the Alternate as applicable, will promptly prepare a written summary of the complaint, including as much detail as possible.

#### *Handling of Complaints Received by Co-Impact*

- All non-anonymous complaints will be acknowledged promptly by the individual who receives the complaint.
- The individual who receives the complaint, if not the CEO, will report it to the CEO or, if the complaint concerns the CEO, to the COO or the Alternate.

- The complaint will be reviewed, possibly with counsel, and investigative action will be undertaken as promptly as possible.
- The CEO, the COO, or the Alternate, as applicable, in consultation with a member of the Board, Board Chair or Audit Committee Chair as necessary, will decide on further actions to be taken, including additional investigation and/or legal or disciplinary action.
- The CEO, the COO, or the Alternate, as applicable, will maintain a written record of all complaints and will report to the Board or authorized committee thereof any complaint that has been determined to be credible and material. This report will generally include a copy of the complaint and the date and nature of the complaint. It will also describe the conduct and status of any investigation and any recommendations to address the complaint. The written record will include all of the aforementioned items, along with a summary of the final resolution.

### 3. Action on Complaints

Co-Impact will take appropriate action in response to any complaints, including disciplinary action against any person or firm who, in Co-Impact's assessment, has engaged in illegal, unethical, or fraudulent conduct or misconduct and, where appropriate, reporting of such misconduct to the relevant civil or criminal or administrative authorities.

Any person who is the subject of a complaint made pursuant to this Policy may not be present at or participate in any Board or committee deliberations or votes on the matter relating to the complaint. However, the Board or authorized committee thereof may request that such person present background information or answer questions at a meeting of the Board or authorized committee thereof prior to the commencement of deliberations or voting.

### 4. Protection under the Policy

Co-Impact will not knowingly, with the intent to retaliate, take any action harmful to any director, officer, employee, or other complainant for:

- reporting a complaint in good faith pursuant to the Policy or to law enforcement officers, governmental agencies or bodies, or persons with supervisory authority over the complainant;
- providing in good faith information regarding a complaint to law enforcement officers, governmental agencies or bodies, or persons with supervisory authority over the complainant, or otherwise assisting in any investigation conducted by Co-Impact; or
- otherwise participating or assisting in a proceeding filed or about to be filed.

Any director, officer, or employee who retaliates against another for reporting a complaint in good faith pursuant to the Policy will be subject to disciplinary action. Any director, officer, or employee who deliberately or maliciously provides false information may be subject to

disciplinary action, up to and including termination from employment or removal from office or from the Board.

This Policy does not create a promise or contract by Co-Impact, and it may be amended at any time without prior notification. Nothing in this Policy should be interpreted as in any way limiting Co-Impact's ability to make employment decisions for reasons outside the scope of this Policy, or limiting an at-will employment relationship, as applicable.

5. Confidentiality

In conducting its investigations and in reporting complaints, Co-Impact will strive to keep as confidential as possible the identity of any complainant or any individual who provides information during or otherwise participates in or assists an investigation, except that Co-Impact may share such information as it deems necessary with appropriate Co-Impact personnel and advisors, or as may be required by law.

6. Scope of Policy

The Policy covers complaints made regarding Co-Impact's financial resources or operations.

7. Contact Information

CEO

Name: Olivia Leland

Email: [olivia@co-impact.org](mailto:olivia@co-impact.org)

COO

Name: Pam Foster

Email: [pam@co-impact.org](mailto:pam@co-impact.org)

Alternate

Name: Tsitsi Masiyiwa

Email: [Padixon@econetwireless.com](mailto:Padixon@econetwireless.com)