



## **Whistleblower Policy**

Clean Air Action Corporation (“CAAC”) requires employees, independent contractors, and volunteers to follow the TIST Values in the conduct of their duties and responsibilities. As employees, independent contractors, and volunteers of CAAC and the TIST Program, we must

- Be honest
- Be accurate
- Be transparent
- Be mutually accountable
- Be servants to each other
- Be volunteers
- Create big results with low budget

### Reporting Responsibility

A whistleblower as defined by this policy is an employee, independent contractor, or volunteer of Clean Air Action Corporation (“CAAC”) who reports an activity that s/he considers to be illegal, dishonest, or violates the TIST Values to his/her Cluster Leader, Cluster Servant, or TIST Leadership, as appropriate. The whistleblower is not responsible for investigating the activity or for determining fault or corrective measures.

Examples of illegal or dishonest activities are violations of federal, state, or local laws; entering false information about TIST Farmers’ groves in Pendragon; seeking reimbursements for services not performed, trips not taken, or data not used; mismanaging TIST Farmers’ payments; and violating the TIST Values.

If an employee, independent contractor, or volunteer has knowledge of or a concern about illegal or dishonest activity, that person is to contact his/her Cluster Leader, Cluster Servant, or TIST Leadership, as appropriate. The employee, independent contractor, or volunteer must exercise sound judgment to avoid baseless allegations. An employee, independent contractor, or volunteer who intentionally makes a false report of wrongdoing will be subject to discipline up to and including termination.

### Confidentiality and No Retaliation

CAAC will keep the name of the whistleblower confidential as much as possible. However, the whistleblower’s name may have to be disclosed to conduct a thorough investigation, to comply with the law, and to allow the accused individuals to defend themselves.

CAAC will not retaliate against a whistleblower. This includes, but is not limited to, protection from retaliation in the form of termination, compensation decreases, or poor



work assignments and threats of physical harm. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated. Any whistleblower who believes s/he is being retaliated against must contact his/her Cluster Leader, Cluster Servant, or TIST Leadership, as appropriate.

#### Reporting Procedure

Every employee, independent contractor, and volunteer of CAAC and the TIST Program have agreed to follow the TIST Values. Therefore, all reports of illegal and dishonest activities will be promptly submitted to his/her Cluster Leader, Cluster Servant, or TIST Leadership, as appropriate, who will investigate and coordinate corrective action.

#### Handling of Reported Violations

We expect everyone in the TIST Program and CAAC to take any allegations of wrongdoing seriously, promptly investigate, and take appropriate corrective action if warranted by the investigation. The Cluster Leader, Cluster Servant, and/or TIST Leadership will review the reported activity quickly and within the context of the TIST Values. CAAC will be transparent about what happened and the results of any investigations.