

Whistleblower Policy

This Whistleblower Policy of Zola Levitt Ministries: (1) encourages staff and volunteers to come forward with credible information on illegal practices or serious violations of adopted policies of ZLM; (2) specifies that ZLM will protect the person from retaliation; and (3) identifies where such information can be reported.

1. **Encouragement of reporting.** ZLM encourages complaints, reports or inquiries about illegal practices or serious violations of ZLM's policies, including illegal or improper conduct by ZLM itself, by its leadership or by others on its behalf. Appropriate subjects to raise under this policy would include financial improprieties, accounting or audit matters, ethical violations or other similar illegal or improper practices or policies. Other subjects on which ZLM has existing complaint mechanisms should be addressed under those mechanisms, such as raising matters of alleged discrimination or harassment via ZLM's human resources channels, unless those channels are themselves implicated in the wrongdoing. This policy is not intended to provide a means of appeal from outcomes in those other mechanisms.

2. **Protection from retaliation.** ZLM prohibits retaliation by or on behalf of ZLM against staff or volunteers for making good faith complaints, reports or inquiries under this policy or for participating in a review or investigation under this policy. This protection extends to those whose allegations are made in good faith but prove to be mistaken. ZLM reserves the right to discipline persons who make bad faith, knowingly false or vexatious complaints, reports or inquiries or who otherwise abuse this policy.

3. **Where to report.** Complaints, reports or inquiries may be made under this policy on a confidential or anonymous basis. They should describe in detail the specific facts demonstrating the bases for the complaints, reports or inquiries. They should be directed to ZLM's Executive Director or Chairman of the Board of Directors; if both of those persons are implicated in the complaint, report or inquiry, it should be separately directed to all members of the Board of Directors. ZLM will conduct a prompt, discreet and objective review or investigation. Staff or volunteers must recognize that ZLM may be unable to fully evaluate a vague or general complaint, report or inquiry that is made anonymously.