



MAVEN Project Whistleblower Protection Policy

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

Reporting Responsibility

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that MAVEN Project can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees, and volunteers to report concerns about violations of MAVEN Project's code of ethics or suspected violations of laws or regulations that govern MAVEN Project's operations.

No Retaliation

It is contrary to the values of MAVEN Project for anyone to retaliate against any board member, officer, employee, or volunteer who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of MAVEN Project on account of making such a report. An employee who retaliates against someone who has reported a violation in good faith on account of making such a report is subject to discipline up to and including termination of employment.

Reporting Procedure

MAVEN Project has an open-door policy and suggests that employees share their questions, concerns, suggestions, or complaints with their supervisor. If you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with the Chief Executive Officer. Supervisors and managers are required to report complaints or concerns about suspected ethical and legal violations in writing to MAVEN Project's Compliance Officer, who has the responsibility to investigate all reported complaints. Employees with concerns or complaints may also submit their concerns in writing directly to their supervisor or the Chief Executive Officer or MAVEN Project's Compliance Officer, Corrin Colesar ccolesar@mavenproject.org, or may call as follows anonymously and toll-free:

To file a report, provide client code MAVEN and do one of the following:

- Visit www.RedFlagReporting.com and click on “File a Report”
- Call 1-877-647-3335
- Text RFR to 234-231-9005

Or

- Fax to 330-572-8146
- Email to redflag@redflagreporting.com
- Mail to RFR, P.O. Box 4230, Akron, Ohio 44321

Compliance Officer

MAVEN Project’s Compliance Officer, Corrin Colesar, Executive Assistant, is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Compliance Officer will advise the Chief Executive Officer of all complaints and their resolution and will report at least annually to the Chair of the Finance Committee on compliance activity relating to accounting or alleged financial improprieties.

Accounting and Auditing Matters

MAVEN Project’s Compliance Officer shall immediately notify the Finance Committee of any concerns or complaints regarding corporate accounting practices, internal controls, or auditing and work with the committee until the matter is resolved.

Acting in Good Faith

Anyone filing a written 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. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Violations

MAVEN Project’s Compliance Officer will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation.