



## HISTORIC ALEXANDRIA FOUNDATION WHISTLEBLOWER POLICY

### **General**

The Historic Alexandria Foundation (“HAF”) Organization Code of Conduct (the code) requires members of the board of trustees (“board members”), key volunteers, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Employees and representatives of HAF must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

The objectives of the Whistleblower Policy are to establish policies and procedures for the following:

- The submission of concerns regarding questionable accounting or audit matters by employees, trustees, officers, volunteers, and other stakeholders of HAF, on a confidential and anonymous basis
- The receipt, retention, and treatment of complaints received by HAF regarding accounting, internal controls, or auditing matters
- The protection of board members, volunteers, and employees reporting concerns from retaliatory actions

### **Reporting Responsibility**

Each trustee, volunteer, and employee of HAF has an obligation to report in accordance with this whistleblower policy (a) questionable or improper accounting or auditing matters, and (b) violations and suspected violations of HAF’s code (“concerns”).

### **Acting in Good Faith**

Anyone reporting a concern must act in good faith and have reasonable grounds for believing the information disclosed indicates an improper accounting or auditing practice, or a violation of the code. The act of making allegations that prove to be unsubstantiated, and that prove to have been made maliciously, recklessly, or with the foreknowledge that the allegations are false, will be viewed as a serious disciplinary offense. It may also result in discipline, up to and including dismissal from the volunteer position or termination of employment. Such conduct may also give rise to other actions, including civil lawsuits.

### **Confidentiality**

Reports of concerns, and investigation pertaining thereto, shall be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Disclosure of reports of concerns to individuals not involved in the investigation will be viewed as a serious disciplinary offense and may result in discipline, up to and including termination of employment. Such conduct may also give rise to other actions, including civil lawsuits.

### **Authority of Audit and Bylaws Committee (“ABC”)**

All reported concerns will be forwarded to the ABC in accordance with the procedures set forth herein. The ABC shall be responsible for investigating and making appropriate recommendations to the board of trustees, with respect to all reported concerns.

### **No Retaliation**

This whistleblower policy is intended to encourage and enable board members, volunteers, and employees to raise concerns within the HAF for investigation and appropriate action. With this goal in mind, no trustee, volunteer, or employee who, in good faith, reports a concern shall be subject to retaliation or, in the case of an employee, adverse employment consequences. Moreover, a volunteer or employee who retaliates against someone who has reported a concern in good faith is subject to discipline up to and including dismissal from the volunteer position or termination of employment.

### **Reporting Concerns**

#### ***Encouragement of Reporting***

HAF encourages complaints, reports, or inquiries about illegal practices or serious violations of the code of conduct, including illegal or improper conduct by HAF 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, donations or grants mismanagement, contract noncompliance, ethical violations, or other similar illegal or improper practices or policies and raising matters of alleged discrimination or harassment.

#### ***Employees, Members of the Board of Trustees and Other Volunteers***

Employees should first discuss their concern with their immediate supervisor. If, after speaking with their supervisor, the individual continues to have reasonable grounds to believe the concern is valid, the individual should report the concern to the Chair of the ABC. However, if the individual is uncomfortable speaking with their supervisor, or the supervisor is a subject of the concern, the individual should report their concern directly to the Chair of the ABC. In addition, suspected fraud should be reported directly to the Chair of the ABC. If the Chair of the ABC is a subject of the concern, report may be made to any board member.

If the concern was reported verbally to HAF, the reporting individual, with assistance from the board member receiving the report, shall reduce the concern to writing. The board member receiving the report is required to promptly report the concern to the ABC, which has specific and exclusive responsibility to investigate all concerns. If the board member receiving the report, for any reason, does not promptly forward the concern to the ABC, the reporting individual should directly report the concern to another board member. Concerns may also be submitted anonymously. Such anonymous concerns should be in writing and sent directly to the Chair of the ABC but may limit the ability to do a thorough investigation.

If the concern was presented electronically HAF will follow the same protocols that are established for verbal and anonymous reporting.

### **Handling of Reported Violations**

The ABC shall address all reported concerns whether they are verbal, in writing or from a third party whistle-blower. The chair of the ABC or designee shall immediately notify the ABC or finance committee, and the president of any such report. The chair of the ABC or designee will notify the sender and acknowledge receipt of the concern within five business days, if possible. It will not be possible to acknowledge receipt of anonymously submitted concerns.

All reports will be promptly investigated by the ABC, and appropriate corrective action will be recommended to the board of trustees, if warranted by the investigation. In addition, action taken must include a conclusion or follow-up, or both, with the complainant for complete closure of the concern.

The ABC has the authority to retain outside legal counsel, accountants, private investigators, or any other resource deemed necessary to conduct a full and complete investigation of the allegations.

Approved by HAF Board of Trustees  
May 5, 2025