

Whistleblower policy Team Titin, Inc.
Adopted 1-8-2023

This document was created in January 2023 to help guide Team Titin, Inc. protect volunteers and employees against retaliation if they “blow the whistle” on its financial management and accounting practices. The Sarbanes-Oxley Act includes two provisions that apply to nonprofits. Federal law prohibits nonprofits from retaliating against employees who “blow the whistle” on their employer’s accounting practices and from destroying evidence. These legal requirements have led to the recommendations that all nonprofits also adopt a document retention and destruction policy. See separate policy in the “Team Titin, Inc. Document Retention/Destruction Policy”.

“A whistleblower policy encourages staff and volunteers to come forward with credible information on illegal practices or violations of adopted policies of the organization, specifies that the organization will protect the individual from retaliation, and identifies those staff or board members or outside parties to whom such information can be reported.” [Source](#): Instructions to the Form 990

Team Titin, Inc. requires directors, officers, volunteers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As representatives of Team Titin, Inc., 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 Team Titin, Inc. 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 Team Titin, Inc.’s code of ethics or suspected violations of law or regulations that govern Team Titin, Inc.’s operations.

No Retaliation

It is contrary to the values of Team Titin, Inc. 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 Team Titin, Inc. An employee, board member or volunteer who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment or service.

Reporting Procedure

Team Titin, Inc. has an open door policy and suggests that employees and volunteers share their questions, concerns, suggestions or complaints with the President, or the designated Whistleblower Compliance Officer. If you are not comfortable speaking with the President or the Compliance officer or you are not satisfied with their response, you are encouraged to speak with the Board of Directors. Concerned persons are asked to report complaints or concerns about suspected ethical and legal violations in writing to the Team Titin, Inc.'s Compliance Officer who has the responsibility to investigate all reported complaints.

The Team Titin, Inc.'s Compliance Officer, is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Complaint Recipient, will acknowledge to the complainant the receipt of the complaint/concern. The Compliance Officer, will update the Board of Directors on all complaints and their status. If the Whistleblower Compliance Officer is the person suspected of wrongdoing, the whistleblower may contact the Board of Directors directly.

Accounting and Auditing Matters

The Team Titin, Inc.'s Whistleblower Compliance Officer, shall immediately notify the Board of Directors of any concerns or complaint regarding corporate accounting practices, internal controls or auditing and work with the committee until the matter is resolved. Bank statements with redacted account numbers shall be placed in a shared drive on the Team Titin, Inc.'s Google Workplace for nonprofits on a monthly basis for review by the entire Board of Directors.

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 The Team Titin, Inc.'s Whistleblower 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.

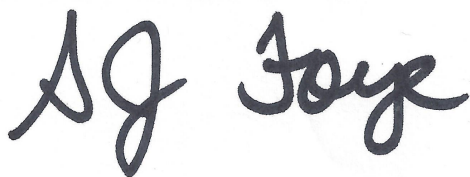
Compliance Officer: Whistleblower Compliance Officer,
designated by the organization to receive, investigate and respond to Complaints.

Policy approved by the Board of Directors on 01-08-23



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