

NEW HAMPSHIRE WRITERS' PROJECT

WHISTLEBLOWER PROTECTION POLICY

Introduction

New Hampshire Writers Project ("NHWP"), a 501(c)(3) New Hampshire non-profit corporation, adopts the following Whistleblower Protection Policy in order to strengthen its existing policies and procedures, maintain and exemplify "best practices," and comply with applicable laws and regulations.

The Whistleblower Policy

NHWP is committed to facilitating open and honest communications relevant to its governance, finances, and compliance with all applicable laws and regulations. NHWP requires trustees, officers, members and volunteers to observe high standards of business and personal ethics in the conduct of their NHWP duties and responsibilities. Trustees, officers, members and volunteers of NHWP must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

This Whistleblower Protection Policy ("the Whistleblower Policy") reflects the practices and principles of behavior that support this commitment. It is important that NHWP Board be apprised about unlawful or improper behavior including, but not limited to, any of the following conduct:

- theft;
- financial or safety reporting which is fraudulent, intentionally misleading or negligent in any manner;
- improper or undocumented financial transactions;
- forgery or alteration of documents;
- unauthorized access, alteration or manipulation of documents, or computer files of or pertaining to NHWP, its Board, its members or its volunteers;
- improper destruction of records;
- improper use of NHWP assets, including, but not limited to its property, facilities, funds, supplies, and other assets;
- improper access and or use of confidential information;
- authorizing or receiving compensation for goods not received or services not performed;
- violations of this Whistleblower Policy;
- any other improper occurrence regarding cash, financial procedures, safety or reporting;
- any abuse of, or discrimination against an NHWP member, or volunteer; and
- a failure to provide reasonable accommodation for disability or religious belief.

We request the assistance of any NHWP trustee, member or volunteer who has a reasonable belief or suspicion about any improper transaction or activity. NHWP values this input, and each trustee,

member, or volunteer should feel free to raise issues of concern in good faith, without fear of retaliation. Trustees, members and volunteers will not be disciplined, expelled, or be retaliated against in any way for asking questions or raising concerns about conduct of this sort.

NHWP will investigate any possible fraudulent or dishonest use or misuse of NHWP resources, or abuse, discrimination or a failure to provide reasonable accommodation by Trustees, members, or volunteers. NHWP will take appropriate action against anyone found to have engaged in fraudulent, dishonest, abusive or discriminatory conduct, including expulsion from NHWP and legal actions when appropriate.

Therefore, all members of NHWP, its trustees and volunteers are encouraged to report possible fraudulent, abusive, discriminatory, or dishonest conduct (i.e., to act as a "whistleblower"), pursuant to the procedures set out below.

Reporting Responsibility

Every trustee, member or volunteer of NHWP has an obligation to report in accordance with this Whistleblower Policy (a) questionable or improper accounting, financial or auditing matters, and (b) violations and suspected violations of NHWP policies or any unlawful or improper conduct involving NHWP property, equipment or facilities (hereinafter collectively referred to as "Concerns").

Authority of Board

All reported Concerns will be forwarded to the Board in accordance with the procedures set forth herein. The Board shall be responsible for investigating and making appropriate decisions with respect to all reported Concerns.

No Retaliation

This Whistleblower Policy is intended to encourage and enable trustees, members and volunteers to raise Concerns within NHWP for investigation and appropriate action. With this goal in mind, no trustee, member or volunteer who, in good faith, reports a Concern shall be subject to retaliation or expulsion. Moreover, a volunteer or member 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 expulsion from NHWP.

REPORTING CONCERNS

Members, Trustees and Volunteers

Members, trustees and volunteers should first discuss their Concern with the NHWP Chairperson. In addition, if the individual is uncomfortable speaking with the Chairperson or if the Chairperson is a subject of the Concern, the individual should report his or her Concern directly to a NHWP Trustee.

If the Concern is related orally to the Chairperson, the reporting individual, with assistance of the Chairperson, shall reduce the Concern to writing. The Chairperson is required to promptly report the Concern to the Board of Trustees, which has specific responsibility to investigate all Concerns. If the Chairperson, for any reason, does not promptly forward the Concern to the Board, the reporting individual should directly report the Concern to the Board of Trustees. Concerns may also be submitted anonymously. Such anonymous Concerns should be in writing and sent directly to the Chairperson or to a member or all members of the NHWP Board of Trustees.

Handling of Reported Concerns

The Chairperson shall immediately notify the Board of Trustees of any such report. The Chairperson will notify the reporter and acknowledge receipt of the Concern within five (5) business days, if possible. It will not be possible to acknowledge receipt of anonymously submitted Concerns. The Board shall address all reported Concerns at a Board Meeting.

All reports will be promptly investigated by the Board, or any other appropriate Committee of the Board of Trustees 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 and/or follow-up with the known reporter for resolution of the Concern.

The Board has the authority to retain outside legal counsel, accountants, private investigators, any other resource, or refer to another appropriate Committee of the Board of Trustees, as deemed necessary to conduct a full and complete investigation of all reported 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 this or another of NHWP policies. 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 and may result in dismissal from the volunteer position, or expulsion from membership. Such conduct may also give rise to other legal actions as the Board may reasonably deem appropriate.

RIGHTS AND RESPONSIBILITIES OF MEMBERS AND VOLUNTEERS

Whistleblower Protection

NHWP will protect whistleblowers as follows:

1. NHWP will use reasonable efforts to protect whistleblowers against retaliation. All Concerns submitted by whistleblowers will be handled with sensitivity, discretion and confidentiality to the extent allowed by the circumstances and the law. Generally, this practice means that whistleblower Concerns will only be shared with those who have a need to know in order to conduct an effective investigation. Should disciplinary or legal action be taken against a person or persons as a result of a whistleblower complaint, such person(s) may also have a right to know the identity of the whistleblower.

2. A whistleblower shall not be subject to retaliation. No punishment for reporting Concerns will be allowed, even if no wrongdoing is found; a reasonable belief or suspicion that unlawful or improper workplace behavior has occurred is enough to create a protected status for the whistleblower. No retaliatory action can be taken against the whistleblower with the intent or effect of adversely affecting the terms or conditions of the whistleblower's membership in the organization, including, but not limited to threats of physical harm, loss of membership or harm to reputation. Whistleblowers who believe that they have been retaliated against may file a written complaint with the Board. Any complaint of retaliation will be promptly investigated, and appropriate corrective measures taken if allegations of retaliation are substantiated. This protection from retaliation does not prohibit NHWP personnel from acting in the usual scope of their duties.

3. Whistleblowers must be cautious to avoid baseless allegations, which are allegations made with reckless disregard for their truth or falsity. People making such allegations may be subject to expulsion by NHWP, and/or legal claims by individuals accused of such conduct.

Notification

This Whistleblower Policy is to be communicated to the Board of Trustees, members and volunteers. The Board will ensure that the Chairperson and each trustee can be reached via the NHWP email address on the NHWP website.

Approved by the Board of Trustees on: *April 8, 2026*