

Hartford Foundation for Public Giving Whistleblower Policy and Procedures

Date of Adoption by the Board of Directors: July 13, 2016

General

The Hartford Foundation for Public Giving (Foundation) is committed to lawful and ethical behavior in all of its activities. Directors, officers, employees, volunteers, consultants, vendors and other agents of the Foundation are required to act in accordance with all applicable laws, regulations and policies and to observe high standards of business and personal ethics in the conduct of their duties and responsibilities.

The objectives of the Foundation's Whistleblower Policy are to establish policies and procedures to:

- prevent or detect and correct improper activities;
- encourage each Foundation director, officer, employee, volunteer, consultant, vendor and other agent of the Foundation (Reporting Individual) to report what he or she reasonably believes to be a material violation of law, the Foundation's policies and procedures, or questionable accounting or auditing matter by the Foundation;
- ensure the receipt, documentation, retention of records, and resolution of reports received under this policy; and
- protect Reporting Individuals from retaliatory action.

Reporting Responsibility

Each Reporting Individual has an obligation to report promptly what he or she has actual knowledge, or a reasonable good faith belief, is a material violation of law, Foundation policies and procedures or any questionable accounting or auditing matter by the Foundation, its officers, directors, employees, volunteers, consultants, vendors, agents or other representatives. A Reporting Individual must also notify the Foundation if an action needs to be taken in order for the Foundation to be in compliance with law or policy or with generally accepted accounting practices.

Employees

Whenever possible, employees should seek to resolve concerns by promptly reporting issues directly to his/her supervisor or to the next level of management as needed until matters are satisfactorily resolved. However, if for any reason an employee is not comfortable speaking to a manager or does not believe the issue is being properly addressed, the employee may contact the Vice President for Finance and Administration or the Foundation's President. If an employee does not believe that these channels of communication can or should be used to express his/her concerns, an employee may

contact the chair of the Foundation's Audit Committee or the Board Chair. Whenever practical, reports should be in writing.

Directors, Officers, Volunteers, Consultants, and Other Agents of the Foundation

Directors, officers, volunteers, consultants, and other agents of the Foundation may submit concerns to the President or directly to the chair of the Audit Committee. If the director, officer, volunteer, consultant, or other agent of the Foundation is not comfortable reporting to either of these individuals or if he/she does not believe the issue is being properly addressed, the report may be made directly to the Board Chair.

Contact information for the President, chair of the Audit Committee and Board Chair may be obtained from the Foundation's website or by calling the Foundation at 860-548-1888. Concerns may be submitted anonymously. Because it is impossible to seek additional information from a Reporting Individual about anonymous reports, it is essential that such reports contain as much specific, verifiable information as possible. The Foundation is under no obligation to investigate vague anonymous reports that do not provide adequate information on which to base an investigation.

Handling of Reported Violations

The Foundation will investigate all reports filed in accordance with this policy with due care and promptness. The person reviewing the report shall promptly (generally within five business days) acknowledge receipt of the complaint to the Reporting Individual if the identity of the Reporting Individual is known.

All reports will be transmitted to the President who will oversee an investigation to determine if the allegations are true, whether the issue is material and what actions, if any, are necessary to correct the problem.

Notwithstanding the foregoing, reports will be transmitted to the chair of the Audit Committee, who shall be responsible for investigation of the matter, if the report concerns the President, or if the President deems it advisable to transfer the investigation.

The chair of the Audit Committee, as applicable, shall refer the matter to the full Audit Committee for investigation. The Audit Committee may conduct a further investigation upon receiving the report. Upon conclusion of the investigation, the Audit Committee shall promptly report its findings to the Board of Directors.

Authority of Audit Committee

The Audit Committee shall have full authority to investigate concerns raised in accordance with this policy and may retain outside legal counsel, accountants, private investigators, or any other resource that the Committee reasonably believes is necessary to conduct a full and complete investigation of matters reported.

No Retaliation

This Whistleblower Policy is intended to encourage and enable Reporting Individuals to raise serious concerns within the organization for investigation and appropriate action. With this goal in mind, no Reporting Individual who, in good faith, reports a concern to the Foundation shall be threatened, discriminated against or otherwise subject to retaliation or, in the case of an employee, adverse employment consequences as a result of such report. Nor will any director, officer, volunteer or employee of the Foundation take any harmful action with the intent to retaliate, including interference with employment or livelihood, against any Reporting Individual for providing to a law enforcement officer or other public body any truthful information relating to a violation or suspected violation with respect to any of the matters set forth above.

Moreover, a director, officer, 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.

Acting in Good Faith

Reporting individuals must act in good faith and have reasonable grounds for believing the matter raised is a serious violation of law or Foundation policies and procedures or a material accounting or auditing matter. The act of making allegations that prove to be unsubstantiated, and that prove to have been made maliciously or with the foreknowledge that the allegations are false, will be viewed as a serious disciplinary offense and may result in discipline, up to and including dismissal from the volunteer position or termination of employment. Depending on the circumstances, such conduct may also give rise to other actions, including civil or criminal lawsuits.

Confidentiality

Reports of concerns, and investigations pertaining thereto, shall be kept confidential to the extent possible. However, consistent with the need to conduct an adequate investigation, the Foundation cannot guarantee complete confidentiality. Disclosure of information relating to an investigation under this policy by Foundation staff, directors, or others involved with the investigation of concerns to individuals not involved in the investigation will be viewed as a serious disciplinary offense and, with respect to Foundation employees, may result in discipline, up to and including termination of employment. Depending on the circumstances, such conduct may also give rise to other actions, including civil or criminal lawsuits.