



Whistleblower Policy

Healing in the Margins (HM) 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 HM, 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, board members, donors, volunteers, and others to raise serious concerns internally so that HM 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 HM's code of ethics or suspected violations of law or regulations that govern HM's operations.

No Retaliation

It is contrary to the values of HM for anyone to retaliate against any employee, board member 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 HM. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

Reporting Procedure

HM has an open door policy and suggests that employees and volunteers share their questions, concerns, suggestions or complaints with their department director. If you are not comfortable speaking with your department director or you are not satisfied with their response, you are encouraged to send an email to the Compliance Administrator at maria.andruschenko@healinginthemargins.com. All department directors and employees are required to report complaints or concerns about suspected ethical and legal violations in writing to the HM's Compliance Administrator.

Compliance Administrator

HM's Compliance Administrator is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Compliance Administrator will advise the Executive Director and/or the Board of Directors of all complaints and their resolution and will report at least annually to the Board of Directors and any Audit Committee on compliance activity relating to accounting or alleged financial improprieties.

Anonymous Reporting

For those wishing to make an anonymous report, complaints can be mailed in typed writing with no return address to:

Healing in the Margins
Compliance Administrator
4701 Trousdale Drive Suite 114
Nashville, TN 37220

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

HM's Compliance Administrator will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation unless the complaint has been made anonymously. All reports will be promptly investigated by the Board of Directors and any appropriate third parties necessary (legal, consulting, etc.). Appropriate corrective action will be taken if warranted by the investigation.

Compliance Officer: * Note: The Compliance Officer may be a board member or a third party designated by the organization to receive, investigate and respond to complaints.

Approved by Board of Directors on: 1/14/2023

Upon approval of this policy by the Board of Directors, this policy and the Compliance Administrator's contact information will be posted on HM's website to enable stakeholders to report their concerns.