

Board Member and Employee Protection Whistleblower Policy

New Incentives, including its affiliate All Babies Are Equal Initiative (hereinafter “New Incentives”), requires its Board Members and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. The purpose of this policy is to encourage and enable Board Members and employees to report any action or suspected action taken that is illegal, fraudulent, or in violation of any adopted policy. It is the intent of New Incentives to adhere to all laws and regulations that apply to the Organization and the underlying purpose of this policy is to support the Organization’s goal of legal compliance. This policy applies to any matter which is related to New Incentives’ business and does not relate to private acts of an individual not connected to the business of New Incentives. This policy is intended to supplement but not replace New Incentives’ related policies and any applicable California and federal laws governing whistleblowing applicable to nonprofit and charitable organizations.

If any Board Member or employee reasonably believes that some policy, practice, or activity of New Incentives is in violation of law or a New Incentives policy, a written complaint must be filed by that Board Member and/or employee with the CEO or Board Chair.

The support of all employees is necessary for achieving compliance with various laws and regulations. Employees are expected to bring any alleged unlawful activity, policy, or practice to the attention of New Incentives and provide management with a reasonable opportunity to investigate and correct the alleged unlawful activity. Specifically, New Incentives has Accounting, Cash Management, Fraud Prevention, Anti-Harassment and Discrimination, and Disciplinary Actions policies in place to deter, identify, and report unlawful practices and employee violations. Furthermore, New Incentives maintains a process whereby complaints and other feedback can be reported anonymously. New Incentives will investigate anonymous allegations to the extent possible, but will weigh the prudence of continuing such investigations against the likelihood of confirming the alleged facts or circumstances from attributable sources.

New Incentives will not retaliate against an employee who in good faith, has proactively raised a complaint against some practice or action of New Incentives, or of another individual or entity with whom New Incentives has a business relationship, on the basis of a reasonable belief that the practice is in violation of law, or a clear mandate of public policy. New Incentives will protect an individual from retaliation for coming forward with credible information regarding illegal practices or violations or adopted policies of the corporation. New Incentives will also protect any other employees who participate in an investigation or legal proceeding relating to the underlying complaint. Any report of retaliation or violation of this policy will also be investigated along with the underlying whistleblower complaint.

New Incentives will not retaliate against Board Members and/or employees who disclose or threaten to disclose to a supervisor or a public body, any activity, policy, or practice of New Incentives that the employee reasonably believes is in violation of a law, or of accounting irregularities, or is in violation of a clear mandate of public policy concerning the health, safety, welfare, or protection of the environment.

Moreover, whistleblowing with regard to any financial irregularities and leakage is actively encouraged at New Incentives.