



WHISTLEBLOWER POLICY



KATY CARES WHISTLEBLOWER POLICY

PURPOSE

Katy Cares, Inc. is committed to operating with the highest standards of integrity, transparency, and ethical conduct. This Whistleblower Policy exists to ensure that every person associated with our organization — whether as an employee, volunteer, board member, contractor, or stakeholder — feels safe, supported, and fully empowered to report any suspected wrongdoing, misconduct, or illegal activity, without fear of retaliation of any kind.

We believe that accountability begins with the courage to speak up. This policy creates the conditions that make that courage possible — by establishing clear, accessible reporting channels, guaranteeing confidentiality to the greatest extent practicable, and explicitly prohibiting retaliation against those who report concerns in good faith.

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1. SCOPE

This policy applies to all individuals associated with Katy Cares, Inc., including:

- Employees and staff — full-time, part-time, and contract
- Volunteers — in all capacities and at all levels
- Board members and advisory board members
- Independent contractors, consultants, and service providers
- Program participants, donors, and community stakeholders who become aware of potential wrongdoing

This policy applies across all physical locations, virtual environments, and any setting — including third-party locations — where Katy Cares conducts its work or is represented.

2. DEFINITIONS

Whistleblower

Any individual who, in good faith, reports suspected wrongdoing, misconduct, or illegal activity involving Katy Cares, its leadership, staff, volunteers, board members, or any person acting on behalf of the organization.

Wrongdoing

Any conduct that is unethical, illegal, fraudulent, or harmful to the organization, its program participants, its funders, or the broader community — including but not limited to financial misconduct, fraud, theft, harassment, discrimination, safety violations, abuse of authority, conflicts of interest, and violations of applicable law or organizational policy.

Good Faith Report

A report made honestly and sincerely by an individual who genuinely believes the information provided is accurate and warrants attention, even if subsequent investigation determines the concern was not substantiated. Good faith does not require certainty — only sincerity.

Retaliation

Any adverse action taken against a person because they reported a concern, participated in an investigation, or supported someone who made a report. Retaliation includes, but is not limited to, dismissal, demotion, reduction in hours or responsibilities, harassment, intimidation, social exclusion, and any other punitive or retributive conduct.

3. WHAT SHOULD BE REPORTED

This policy is intended to address serious concerns about conduct that may harm the organization, its participants, its staff, or the public. Reports under this policy may include, but are not limited to, the following:

- Financial fraud, theft, embezzlement, or misappropriation of funds or assets
- Falsification of financial records, grant reports, expense claims, or organizational documents
- Violation of federal, state, or local laws or regulations
- Misuse of organizational resources, property, or confidential information



- Harassment, discrimination, or abuse of power directed toward staff, volunteers, or program participants
- Conflicts of interest that have not been properly disclosed or managed
- Retaliation against any individual for raising concerns or making a report
- Endangerment of the health, safety, or welfare of residents, participants, or staff
- Any other conduct that violates Katy Cares' policies, values, or legal obligations

Note: This policy is not intended to address routine workplace grievances, performance concerns, or interpersonal disputes — which should be addressed through normal supervisory and HR channels. When in doubt, report the concern and allow the organization to determine the appropriate course of action.

4. REPORTING PROCEDURES

4.1 How to Report

Any individual with a concern covered by this policy is encouraged to report it promptly. Reports may be made through any of the following channels:

- **Primary Contact:** President / Executive Director — [Contact Information]
- **Alternative Contact:** Chairman of the Board of Directors — [Contact Information]
- **Board Member:** Any Board Member — if the concern involves the President or Executive Director
- **Anonymous Report:** Anonymous reporting — reports may be submitted anonymously in writing

4.2 What to Include in Your Report

While no specific format is required, the following information — where available — will assist in conducting a thorough and timely investigation:

- Your name and contact information — if you are not reporting anonymously
- A clear description of the concern, including relevant dates, times, and locations
- The names of individuals involved or implicated, where known
- The names of any witnesses
- Any supporting documentation, evidence, or communications
- The impact the conduct has had or may have on the organization or its participants
- Whether the concern has been previously reported and, if so, to whom

4.3 Anonymous Reporting

Individuals may report concerns anonymously. Katy Cares will make every effort to thoroughly investigate anonymous reports. However, the organization's ability to investigate and resolve concerns may be limited when the reporter cannot be reached for follow-up. Anonymous reporters are encouraged to provide as much detail as possible.

5. INVESTIGATION PROCESS



Upon receiving a report, Katy Cares will follow the process outlined below to ensure that every concern is taken seriously, investigated impartially, and resolved appropriately:

1. Acknowledgment — The organization will acknowledge receipt of the report within five (5) business days of receiving it.
2. Initial Review — The designated recipient will conduct an initial review to assess the nature and seriousness of the concern and determine whether a full investigation is warranted.
3. Assignment — The investigation will be assigned to a neutral party who has no conflict of interest with the matter or the individuals involved. In cases involving senior leadership, the Board of Directors will appoint an independent investigator.
4. Investigation — A thorough and impartial investigation will be conducted, which may include reviewing relevant documents and records, interviewing the complainant (if not anonymous), interviewing the accused party, and interviewing witnesses.
5. Documentation — All aspects of the investigation will be documented, including the findings, the evidence reviewed, the individuals interviewed, and the determination reached.
6. Determination — A conclusion will be reached based on the preponderance of available evidence — meaning it is more likely than not that the reported conduct occurred.
7. Outcome — The whistleblower will be informed of the outcome of the investigation, subject to confidentiality constraints and applicable legal considerations.
8. Corrective Action — Where a violation is confirmed, appropriate corrective and/or disciplinary action will be taken promptly.

Timeline: Investigations will generally be completed within thirty (30) calendar days of receipt of the report. In more complex cases, additional time may be required. The whistleblower will be notified of any delay and provided with an estimated revised timeline.

6. PROTECTION AGAINST RETALIATION

Katy Cares strictly and unconditionally prohibits retaliation of any kind against any individual who reports a concern in good faith under this policy, participates in an investigation, or supports someone who has made a report.

Retaliation is itself a serious policy violation and will be treated with the same gravity as the original misconduct reported. Any person found to have engaged in retaliation will face disciplinary action up to and including termination of employment, removal from volunteer service, or removal from the Board of Directors.

Any individual who believes they have experienced retaliation for making a report or participating in an investigation should report the retaliatory conduct immediately through the channels identified in Section 5 of this policy. Reports of retaliation will be investigated with the same urgency and impartiality as any other report under this policy.



7. CONFIDENTIALITY

Katy Cares is committed to maintaining the confidentiality of both the whistleblower and the subject of any report, to the greatest extent possible, while still conducting a thorough and effective investigation.

- Information relating to a report will be shared only with those who have a genuine need to know to investigate and resolve the matter
- The identity of the whistleblower will not be disclosed without their consent, unless disclosure is required by law or is essential to a fair and thorough investigation
- All parties involved in an investigation are expected to maintain strict confidentiality throughout the process
- Breach of confidentiality by any party is itself a policy violation subject to disciplinary action

Note: While Katy Cares will protect confidentiality to the greatest extent practicable, absolute confidentiality cannot be guaranteed in all circumstances — particularly where disclosure is required by applicable law or where the safety of individuals is at risk.

8. FALSE REPORTS

Katy Cares strongly encourages good-faith reporting and recognizes that not every concern reported will ultimately be substantiated following investigation. A report that cannot be confirmed does not automatically mean it was false or made in bad faith.

However, any individual who knowingly and deliberately makes a false report — with the intent to harm another person, damage a reputation, or disrupt organizational operations — will be subject to disciplinary action, which may include termination of employment, removal from volunteer service, or removal from the Board of Directors, as well as potential legal consequences where applicable.

9. COMMUNICATION AND TRAINING

9.1 Policy Dissemination

This policy will be communicated to all employees, volunteers, board members, contractors, and stakeholders upon adoption and upon any subsequent update. It will be included in orientation materials for all new staff, volunteers, and board members, and will be maintained in a location accessible to all organizational members.

9.2 Training

Katy Cares will provide regular training to ensure that all staff, volunteers, and board members understand this policy, know how to report concerns, and are fully aware of the protections afforded to them. Training will cover the following:

- The purpose and scope of the Whistleblower Policy
- What constitutes wrongdoing and what should be reported
- How to make a report — including anonymously
- The investigation process and what reporters can expect
- Protection against retaliation and how to report it



- Confidentiality obligations and expectations
- Consequences for false reports and retaliatory conduct

10. LEGAL COMPLIANCE

This policy is designed to comply with all applicable federal, state, and local whistleblower protection laws and nonprofit governance requirements, including but not limited to the following:

- Sarbanes-Oxley Act of 2002 (SOX) — Section 1107, which prohibits retaliation against whistleblowers who report federal offenses
- IRS Form 990 requirements — which require nonprofit organizations to disclose whether they have a written whistleblower policy in place
- Texas Business Organizations Code — applicable nonprofit governance requirements
- Texas Penal Code — provisions relating to retaliation and interference with reporting
- All other applicable federal, state, and local whistleblower protection statutes

Nothing in this policy limits any individual's rights or remedies available under applicable law. Individuals retain the right to report concerns to relevant external authorities, including the IRS, the Texas Attorney General's Office, the Equal Employment Opportunity Commission (EEOC), or any other applicable regulatory or law enforcement agency.

11. POLICY REVIEW AND UPDATES

This policy will be reviewed annually by organizational leadership and the Board of Directors to ensure it remains current, effective, and compliant with applicable legal and regulatory requirements. Any material updates will be communicated promptly to all staff, volunteers, and board members and incorporated into training materials accordingly.

12. POLICY ADOPTION

This policy was adopted by the Board of Directors of Katy Cares, Inc. on the date indicated below.

A handwritten signature in black ink that reads "Jerry Edmonson".

Chairman: Board of Directors
Dr. Jerry Edmonson

A handwritten signature in black ink that reads "Dawid J Pieterse".

President: Executive Director
Dr. Dawid J Pieterse

Effective Date: April 1, 2020

Last Revised: April 1, 2026

Next Review Date: April 1, 2027

Katy Cares, Inc. is committed to operating with integrity, transparency, and accountability. This policy reflects our conviction that speaking up is an act of courage — and that those who do deserve our full protection and sincere gratitude.