

LIVING AND LEARNING ENRICHMENT CENTER

WHISTLEBLOWER PROTECTION POLICY

Living and Learning Enrichment Center (LLEC) requires directors, officers, employees, and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of LLEC, 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 and others to raise serious concerns so that LLEC 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 LLEC's code of ethics or suspected violations of law or regulations that govern LLEC's operations.

No Retaliation

It is contrary to the values of LLEC for anyone to retaliate against any Board member, officer, employee, 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 LLEC. 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

LLEC has an open-door policy and suggests that employees share their questions, concerns, suggestions or complaints with their supervisor. If you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with the current Human Resources Director for LLEC, and/or the current Executive Director, who will have the responsibility to order the investigation of all reported complaints, except as enumerated below. Employees with concerns or complaints may submit their concerns in writing directly to their supervisor or Executive Director, or LLEC's Human Resources Director, who shall also serve as LLEC's Compliance Officer. All verbal complaints to any supervisor, Executive Director, or LLEC's Compliance Officer, shall be immediately reduced to writing by the recipient of the complaint, signed by the complainant verifying its accuracy, and provided immediately to the LLEC Compliance Officer for investigation and further handling. LLEC shall maintain a separate and distinct location to serve as a depository for all such complaints, investigations, results, recommendations and any other records applicable to or generated as a result of any such complaint. Under no circumstances shall any such complaint(s) become a part of, be recorded in, or deposited in any employee's personnel file.

Compliance Officer

LLEC's Compliance Officer is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Compliance Officer will advise the Executive Director and the Board of Directors of all complaints and unless the complaint involves the Executive Director, and any resolution will be subject to review and consideration by the Executive Director and Board approval and will report at least annually to the Treasurer on compliance activity relating to accounting or alleged

financial improprieties. If any such complaint involves any Board Director, said Director will not participate in or review any investigation, findings, and/or any proposed resolution for approval. If the complaint involves LLEC's Compliance Officer, the complaint should be submitted to the Executive Director and/or the presiding Board President in the Executive Director's absence. The investigation and further handling of the complaint will be addressed at the direction of the Executive Director and/or presiding Board President, and assigned to be handled in the like manner as any other complaint of this nature, without the LLEC Compliance Officer's involvement. If a complaint involves the Executive Director, the complaint should be submitted to the presiding Board President by the Compliance officer. The investigation and further handling of such a complaint will be addressed at the direction of the Board of Directors at a meeting called or scheduled immediately for this purpose, and without the involvement of the Executive Director.

Accounting and Auditing Matters

LLEC's Compliance Officer shall immediately notify the Board Treasurer of any concerns or complaint regarding corporate accounting practices, internal controls or auditing and work with the Finance Committee until the matter is resolved, and the Board Treasurer shall keep the Board adequately informed and up to date on the status of any such complaint(s) in this regard, including investigations, results and/or recommendations.

Acting in Good Faith

Anyone filing a written complaint or bringing a verbal complaint to the Executive Director, presiding Board President, LLEC's Compliance Officer, and/or a supervisor, 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 the investigation establishes were made maliciously or with actual knowledge of their falsehood, will be viewed as a serious disciplinary offense.

Confidentiality

Complaints of violations or suspected violations submitted to LLEC in any of the manners set forth herein will be treated as confidential by LLEC and the complainant. Complaints of violations or suspected violations will be kept confidential by LLEC to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Violations

LLEC's Compliance Officer will notify anyone who submits a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.



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Policy approved by the Board of Directors Resolution on

Dated: April 21, 2025