

Sky Tavern Whistleblower Protection Policy

Sky Tavern and its governing Board of Directors (BOD) are committed to high standards of transparency, accountability, ethics and integrity. This policy is intended to inform management, staff, volunteers, consultants, suppliers, donors and other third parties (hereinafter, all “Stakeholders”) of this commitment, to encourage reporting of possible violations at the earliest opportunity, to lay out procedures for the reporting and investigation of any reports or complaints, and to clarify the protections afforded to whistleblowers.

Sky Tavern has zero tolerance toward fraud, corruption, bribery, and any malpractice or wrongdoing. As employees and representatives of Sky Tavern, we must practice honesty and integrity in fulfilling our roles and responsibilities and comply with all applicable laws and regulations. All Stakeholders are encouraged to follow the procedures outlined for reporting any concerns or complaints surrounding improper behavior. Those who raise concerns in good faith can do so without fear of reprisal or disciplinary action.

Definition

Whistleblowing is defined as the deliberate, voluntary disclosure of any suspected misconduct within or associated with Sky Tavern. A whistleblower is any person that comes forward with a concern or complaint and makes an oral or written report, whether anonymously made or not, relating to an instance of any of the following:

- A breach of, a failure to implement, or a failure to comply with, Sky Tavern’s governing rules, procedures, policies, or established standards of practice (*e.g. accounting; procurement; grants making; human resources*); or
- Any illegal or unlawful conduct (*e.g. fraud, corruption*); or
- Any behavior that is unethical or inconsistent with the standards the organization subscribes to under our Ethics Policy as delineated in our Bylaws; or
- Any circumstance that could waste SKY TAVERN resources or pose a risk to the organization’s reputation and integrity; or
- Any dangerous practices or actions likely to cause physical harm or damage to a person or to property; or
- Any potential abuse of power or authority for any unauthorized or ulterior purpose; or
- Any situation in which the potential for a conflict of interest exists; or
- Any personal harassment, whether sexual, racial or otherwise that is significant or persistent; or
- Any attempt to cover up any of the above.

Reporting Responsibility

All employees have a responsibility to report serious concerns internally so that Sky Tavern can address and correct inappropriate conduct and actions. All other Stakeholders are encouraged to report legitimate concerns about violations of Sky Tavern's code of ethics, rules of governance, and suspected violations of law or regulations that govern Sky Tavern's operations.

No Retaliation

It is contrary to the values of Sky Tavern for anyone to retaliate against any individual who in good faith makes a whistleblower report. Any board member, manager or employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment or dismissal from the Board (as applicable). Sky Tavern will disassociate themselves from any other stakeholders who are determined to have engaged in unacceptable conduct or actions, their membership (if applicable) will be terminated, and they will no longer be welcome to use Sky Tavern's facilities.

If a whistleblower has any personal interest in the matter, he/she must make this clear at the time the alleged misconduct is reported. The act of whistle-blowing will not shield whistleblowers from the reasonable consequences flowing from any involvement in misconduct.

Reporting Procedure

Sky Tavern has an open-door policy and encourages employees to share their questions, concerns, suggestions, or complaints with their immediate supervisor.

If you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you should speak with the Executive Director.

If for any reason, you are not comfortable speaking with the Executive Director, you may either contact any board member or file a written report. In any case where an individual wishes to remain anonymous, they should file a report by sending an email to transparency@skytavern.com.

Supervisors and managers are required to report, or forward any complaints or concerns reported by their employees, to Sky Tavern's Executive Director. If such allegations include concerns of any kind around the Executive Director, then the report should be made to the Vice Chairman or Board Treasurer.

Employees with concerns or complaints are encouraged, but not required, to submit their concerns in writing before approaching a Board member.

Whistleblowers may report their concerns with Full Disclosure, (their name disclosed in the report); Partially Anonymous, (their name known but not disclosed, without their consent (with all possible diligence, or unless required by law); Anonymously, they choose not to identify themselves to anyone at any time. Although anonymous reports are welcome and will be investigated, Whistleblowers are encouraged to identify themselves to assist with the investigation.. Should they choose to remain anonymous, it essential to provide as much information and evidence as possible.

Whistleblowers may choose to use the form in Appendix A. This report may be submitted in person, via email to transparency@skytavern.com, or by mail to 21130 Mt Rose Hwy Reno, NV 89511. Should a report need to be addressed to the board of directors, they may use the email address first-name.last-name@skytavern.com of the appropriate board member.

The Executive Director, Vice Chairman or Board Treasurer (as applicable) will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation.

Whistleblower Report Investigation

Investigations will be conducted following a systematic and diligent approach, resulting in a report to the Board. The Executive Director is responsible for ensuring that all whistleblower complaints are investigated and resolved. The Executive Director will advise the Board of Directors' executive committee of all complaints and their resolution and will report at least annually to the Board Treasurer on compliance activity.

Should the Executive Director be the target of the complaint, the Board's Executive committee will appoint a board member to perform the complaint investigation and response.

Where appropriate, the Executive Director (or Vice Chairman or Board Treasurer, as applicable) may determine that a third party such as an attorney may need to be retained to assist with the investigation, and in situations where there is potential criminal conduct, it may also be appropriate to notify local, state or Federal law enforcement officials.

The resulting report will contain sufficient detail including statements and evidence in order to determine whether wrongdoing occurred including the names of any individuals engaging in unacceptable behavior. All efforts shall be made to complete the investigation within 30 days.

The Board Executive committee will take action, in coordination with the Executive Director, to resolve the matter. All reports will be held for a term of five years.

Accounting and Auditing Matters

The Executive Director shall immediately notify the Board Treasurer of any concerns or complaints regarding corporate accounting practices, internal controls, or auditing and work with the Finance committee until the matter is resolved.

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 are not 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.

Policy approved by the Board of Directors on **18 January 2023**.