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WHISTLEBLOWER POLICY

The Brandywiners Ltd requires its directors, officers, volunteers, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As a representative of The Brandywiners Ltd, 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 our directors, officers, volunteers, and employees and others to raise serious concerns internally so that The Brandywiners Ltd 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 The Brandywiners Ltd's code of ethics or suspected violations of law or regulations that govern The Brandywiners Ltd's operations.

No Retaliation

It is contrary to the values of The Brandywiners Ltd 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 The Brandywiners Ltd's name. Any director, officer, volunteer, and employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including permanent separation from The Brandywiners Ltd.

Reporting Procedure

The Brandywiners Ltd has an open door policy and suggests that its directors, officers, volunteers, and employees share their



questions, concerns, suggestions or complaints with their supervisor and/or volunteer chairperson. 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 a board member. Volunteer supervisors and chairs are required to report complaints or concerns about suspected ethical and legal violations in writing (email or traditional) to the The Brandywiners Ltd's Board President, who will serve as the Compliance Officer and has the responsibility to investigate all reported complaints. The Brandywiners Ltd's Board President is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Compliance Officer will advise the Board of Directors of all complaints.

Accounting and Auditing Matters

The The Brandywiners Ltd's Compliance Officer shall immediately notify the Audit Committee/Finance Committee of any concerns or complaint regarding corporate accounting practices, internal controls or auditing and work with the 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 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

The The Brandywiners Ltd's Compliance Officer will notify the person who submitted 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.

Compliance Officer: President of The Brandywiners Ltd Board

Organization: The Brandywiners Ltd

Contact: admin@Brandywiners.org

To learn more, visit www.Brandywiners.org or send an email to admin@Brandywiners.org.

Whistleblower policy documentation
approved by The Brandywiners Ltd Board of Directors
May 4, 2020