

George C. Marshall Foundation Whistleblower Policy

The George C. Marshall Foundation expects its directors, trustees, officers, employees, and other representatives to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the Marshall Foundation, we must practice honesty and integrity in fulfilling responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

It is the responsibility of all directors, officers and employees to report wrongful conduct in accordance with this Whistleblower Policy.

Wrongful Conduct

“Wrongful Conduct” is defined to include: a serious violation of George C. Marshall Foundation policy; a violation of applicable state or federal law; or the use of Foundation property, resources, or authority for personal gain or other non-organization-related purpose, except as provided by the Marshall Foundation.

This definition of Wrongful Conduct is not intended to be an exclusive listing of the illegal or improper activity encompassed by the Whistleblower Policy. Rather, the Whistleblower Policy is intended to serve as a means of reporting all serious improprieties that potentially impact the integrity and effective operation of the Marshall Foundation.

Reporting Wrongful Conduct

The Marshall Foundation encourages its directors, officers, and employees to share their questions, concerns, suggestions, or complaints with someone who can address them properly. Any employee should report their concerns of Wrongful Conduct to someone who can address them properly, in most cases, to the employee’s supervisor. If the Wrongful Conduct implicates the supervisor, or if the reporting individual is not comfortable speaking with or not satisfied with the response of the supervisor, the issue may be reported to the president or to the chief financial officer. In the event the employee wishes to report the Wrongful Conduct outside the foundation offices, the reporting individual may contact the chairman of the Foundation Board or his designee.

Acting in Good Faith

Anyone who files a complaint of Wrongful Conduct must be acting in good faith and have reasonable grounds for believing the information disclosed is true and indicates Wrongful Conduct. Any allegations that prove not to be substantiated and which prove to have been made maliciously or without factual basis will be viewed as a serious disciplinary offense.

Confidentiality

Reports of Wrongful Conduct or suspected Wrongful Conduct may be submitted on a confidential basis. Reports of Wrongful Conduct or suspected Wrongful Conduct will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Wrongful Conduct

A supervisor receiving a report of Wrongful Conduct shall notify the president or chief financial officer who will notify the sender and acknowledge receipt of the reported Wrongful Conduct or suspected Wrongful Conduct within five business days. All reports will be promptly investigated at the direction of the president of the Foundation or the chairman of the Board and appropriate corrective action will be taken if warranted by the investigation.

No Retaliation

No director, officer, or employee who in good faith reports Wrongful Conduct will suffer harassment, retaliation or adverse employment consequences. Any director, officer, or employee who retaliates against anyone who has reported Wrongful Conduct in good faith is subject to discipline up to and including termination of employment or removal from the board of directors, as applicable. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns with the Marshall Foundation prior to seeking resolution outside the Marshall Foundation.