

THE BLUE BIRD CIRCLE

WHISTLEBLOWER POLICY AND PROCEDURES

General

The Blue Bird Circle (the "Circle") is committed to lawful and ethical behavior in all of its activities and requires directors, officers, volunteers and employees to act in accordance with all applicable laws, regulations and policies and to observe high standards of business and personal ethics in the conduct of their duties and responsibilities.

The objectives of the Circle's Whistleblower Policy are to establish policies and procedures to:

- prevent or detect and correct improper activities
- encourage each Circle board member, officer, volunteer and employee ("reporting individual") to report what he or she in good faith believes to be a material violation of law or policy or questionable accounting or auditing matter by the Circle
- ensure the receipt, documentation, retention of records, and resolution of reports received under this policy
- protect reporting individuals from retaliatory action.

Reporting Responsibility

Each reporting individual has an obligation to report what he or she believes is a material violation of law or policy or any questionable accounting or auditing matter by the Circle, its officers, directors, employees, volunteers, agents or other representatives. Reporters must also notify the Circle if an action needs to be taken in order for the Circle to be in compliance with law or policy or with generally accepted accounting practices. The types of concerns that should be reported include, for purposes of illustration and without being limited to, the following:

- providing false or misleading information on the Circle's financial documents, grant reports, tax returns or other public documents
- providing false information to or withholding material information from the Circle's auditors, accountants, lawyers, directors or other representatives responsible for ensuring the Circle's compliance with fiscal and legal responsibilities
- embezzlement, private benefit, or misappropriation of funds
- material violation of the Circle policy, including among others, confidentiality, conflict of interest, whistleblower, ethics and document retention
- discrimination based on race, gender, sexual orientation, ethnicity, and disability
- facilitation or concealing any of the above or similar actions

Reporting Concerns

Employees

Whenever possible, employees should seek to resolve concerns by reporting issues directly to his/her manager or to the next level of management as needed until matters are satisfactorily resolved. However, if for any reason an employee is not comfortable speaking to a manager or does not believe the issue is being properly addressed, the employee may contact the Circle's attorney Tama Klosek or the President. Whenever practical, reports should be in writing.

Directors, Officers and Other Volunteers

Directors, Officers and other volunteers may submit concerns to the President. If the director, officer or volunteer is not comfortable reporting to the President or if he or she does not believe the issue is being properly addressed, the director, officer or volunteer may report directly to the Circle's attorney Tama Klosek.

Contact information for the President may be obtained by calling the Circle at 713-528-0470. Concerns may be submitted anonymously. Because it is impossible to seek additional information from a reporting individual about anonymous reports, it is essential that such reports contain as much specific information as possible.

Handling of Reported Violations

The Circle will investigate all reports filed in accordance with this policy with due care and promptness. Matters reported internally without initial resolution will be investigated by the President of the Circle to determine if the allegations are true, whether the issue is material and what actions, if any, are necessary to correct the problem. The President will issue a full report of all matters raised under this policy to the Board of Directors. The Board of Directors may conduct a further investigation upon receiving the report from the President.

For matters reported directly to the Circle's attorney, the attorney shall promptly (generally within five business days) acknowledge receipt of the complaint to the complainant if the identity of the complainant is known and conduct an investigation to determine if the allegations are true and whether the issue is material and what, if any, corrective action is necessary. Upon the conclusion of this investigation, shall promptly report the findings to the Board of Directors.

No Retaliation

This Whistleblower Policy is intended to encourage and enable directors, officers, volunteers and employees to raise serious concerns within the organization for investigation and appropriate action. With this goal in mind, no director, officer, volunteer or employee who, in good faith, reports a concern shall be threatened, discriminated against or otherwise subject to retaliation or, in the case of an employee, adverse employment consequences as a result of such report. Moreover, a director, officer, volunteer or employee who retaliates against someone who has

reported a concern in good faith is subject to discipline up to and including dismissal from the Board, officer or volunteer position or termination of employment.

Acting in Good Faith

Anyone reporting a concern must act in good faith and have reasonable grounds for believing the matter raised is a serious violation of law or policy or a material accounting or auditing matter. The act of making allegations that prove to be unsubstantiated, and that prove to have been made maliciously, recklessly, with gross negligence, or with the foreknowledge that the allegations are false, will be viewed as a serious disciplinary offense and may result in discipline, up to and including dismissal from the volunteer position or termination of employment. Depending on the circumstances, such conduct may also give rise to other actions, including civil or criminal lawsuits.

Confidentiality

Reports of concerns, and investigations pertaining thereto, shall be kept confidential to the extent possible. However, consistent with the need to conduct an adequate investigation, the Circle cannot guarantee complete confidentiality. Disclosure of information relating to an investigation under this Whistleblower Policy by Circle staff, directors, officers or others involved with the investigation of concerns to individuals not involved in the investigation will be viewed as a serious disciplinary offense and, with respect to Circle employees, may result in discipline, up to and including termination of employment. Depending on the circumstances, such conduct may also give rise to other actions, including civil or criminal lawsuits.

Acknowledgment

My signature below indicates my receipt and understanding of The Blue Bird Circle Whistleblower Policy. I also verify that I have been provided with an opportunity to ask questions about the Whistleblower Policy.

Signature: _____

Date: _____

Printed Name: _____