

Union Home Mortgage Foundation Whistle Blower Policy

General

The Union Home Mortgage Foundation (UHM Foundation) requires its directors, officers, employees and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. All employees and representatives of the UHM Foundation must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

It is the responsibility of all directors, officers, employees and volunteers to report legal and ethical violations or suspected violations in accordance with this Whistleblower Policy.

No Retaliation

No director, officer, employee or volunteer who in good faith reports a legal or ethical violation shall suffer harassment, retaliation or adverse employment consequence. An employee, officer or volunteer who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. Directors may be removed from office for violations. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within the UHM Foundation prior to seeking resolution outside of the organization.

Reporting Violations

The UHM Foundation has an open door policy and suggests that employees share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an employee's or volunteer's supervisor is in the best position to address an area of concern. However, 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 anyone in Compliance or anyone on the UHM Foundation Board of Directors whom you are comfortable approaching. Members of the Board of Directors are required to report suspected legal or ethical violations to Compliance, who has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or when you are not satisfied or are uncomfortable with following the UHM Foundation's open door policy, individuals should contact the Compliance officer directly.

Compliance Officer

The organization's compliance officer is responsible for investigating and resolving all reported complaints and allegations concerning legal and ethical violations and, at his/her

discretion, shall advise the Executive Director and the Board of Directors. A representative of the Compliance department is required to report to the Board of Directors at least annually on compliance activity.

Accounting and Auditing Matters

The Board of Directors shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. Compliance shall immediately notify the Board of Directors of any such complaint and work with them until the matter is resolved.

Acting in Good Faith

Anyone filing a complaint concerning a legal or ethical violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a legal or ethical 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 or may be submitted anonymously. 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

Compliance will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

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