

Whistleblower Protection Policy

Effective Date: March 10, 2026

Approved by the Vision Share Board of Directors

1. Purpose

Vision Share is committed to lawful, ethical, and transparent operations in all aspects of its mission.

This Whistleblower Protection Policy is intended to:

- Encourage directors, officers, employees, volunteers, and partners to report good-faith concerns
- Protect individuals from retaliation
- Promote accountability and responsible governance

2. Scope

This policy applies to:

- Board members
- Officers
- Employees
- Volunteers
- Contractors acting on behalf of Vision Share

3. Reportable Concerns

Individuals are encouraged to report concerns involving:

- Financial misconduct or fraud
- Misuse of funds or assets
- Conflicts of interest not disclosed
- Ethical violations
- Violations of laws or regulations
- Improper tissue placement practices
- Misrepresentation in reporting or grant documentation
- Retaliation against reporting individuals

4. Reporting Procedure

Concerns may be reported to:

- Executive Director
- Board Chair
- Treasurer
- Or designated independent board member

If the concern involves senior leadership, the report should be made directly to the Board Chair. Reports may be submitted in writing or verbally.

5. Confidentiality

Vision Share will make reasonable efforts to maintain confidentiality to the extent possible while conducting a thorough investigation.

Anonymous reports may be submitted; however, sufficient detail should be provided to allow investigation.

6. Protection Against Retaliation

No director, officer, employee, volunteer, or contractor who in good faith reports a concern shall suffer harassment, retaliation, or adverse employment consequences.

Any act of retaliation is a serious violation of this policy and may result in disciplinary action.

7. Investigation

Upon receiving a report:

- The appropriate authority shall acknowledge receipt.
- A prompt and impartial investigation shall be conducted.
- Findings and corrective actions shall be documented.

If necessary, the Board may engage independent legal or financial advisors.

8. False Reports

Reports made in good faith are protected. However, knowingly making false accusations may result in disciplinary action.

9. Oversight

The Board of Directors is responsible for oversight of this policy and ensuring compliance.

10. Policy Distribution

This policy shall be distributed to:

- Board members
- Employees
- Key volunteers

It shall also be made publicly available on the Vision Share website to reinforce transparency and accountability.