



WHISTLEBLOWER POLICY

General: All Clowns International (CI) Officers and members are to observe high standards of business and personal ethics in the conduct of their duties and responsibilities and must practice honesty and integrity in fulfilling their responsibilities, complying with all applicable laws and regulations. This Whistleblower Policy is intended to encourage all members and others to raise serious concerns with the CI prior to seeking resolution outside the CI.

Reporting Responsibility: It is the responsibility of all Officers and members to comply with the standards and to report violations or suspected violations in accordance with this Whistleblower Policy.

No Retaliation: No Officer or member who in good faith reports a violation of these standards shall suffer harassment, retaliation or adverse consequence. Any Officer or member who retaliates against someone who has reported a violation in good faith is subject to termination of membership.

Reporting Violations: The CI has an open door policy and suggests that members share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, the Management Officer in the area of concern is the best person to address that concern. However, if you are not comfortable speaking with that Officer or you are not satisfied with the Officer's response, you are encouraged to speak with another Management Officer with whom you are comfortable in approaching.

All Officers are required to report suspected violations of these standards to the Chairperson, who has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or when the complainant is not satisfied or uncomfortable with following the CI open door policy, individual should contact the Chairperson directly.

Chairperson (Compliance Officer): The CI Chairperson is responsible for investigating and resolving all reported complaints concerning violations of these standards and, at his direction, shall advise the Management Committee. The Chairperson is required to report all compliance activity to the Management Committee at least annually.

Handling of Report Violations: The Chairperson will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be investigated promptly with appropriate corrective action taken if warranted by the investigation.

Accounting and Auditing Matters: The Management Committee shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Chairperson shall immediately notify the Management Committee of any such complaint and work with the committee until the matter is resolved.

Acting in Good Faith: Anyone filing a complaint regarding a violation or suspected violation of these standards must be acting in good faith having reasonable grounds for believing the information disclosed indicates a violation of the code. Any allegations that prove to be unsubstantiated and which prove to be malicious or knowingly to be false will be viewed as a serious disciplinary offense and is subject to termination of membership.

Confidentiality: Violations or suspected violations may be submitted on a confidential basis by the complainant or may be made anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Chairperson Deanna Hartmier

Dated 11 April 2022