

**MILLHOUSE FOUNDATION  
NON-PROFIT CORPORATION  
CODE OF ETHICS AND WHISTLEBLOWER POLICY**

**ARTICLE I  
PURPOSES**

**1.0 Purpose**

MillHouse Corporation requires and encourages directors, officers, and employees to observe and practice high standards of business and personal ethics in the conduct of their duties and responsibilities. The employees and representatives of the corporation must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations. It is the intent of MillHouse Foundation to adhere to all laws and regulations that apply to the corporation and the underlying purpose of this policy is to support the corporation's goal of legal compliance. The support of all corporate staff is necessary to achieve compliance with various laws and regulations.

**ARTICLE II  
VIOLATIONS**

**2.0 Reporting Violations**

If any director, officer, staff, or employee reasonably believes that some policy, practice, or activity of MillHouse Foundation is in violation of the law, she/he must file a written complaint with the vice president or the board president.

**ARTICLE III  
GOOD FAITH**

**3.0 Acting in Good Faith**

Anyone filing a complaint concerning a violation or suspected violation of the Code must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Code. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false shall be viewed as a serious disciplinary offense.

**ARTICLE IV  
RETALIATION**

**4.0 Retaliation**

Said person protected from retaliation only if she/he brings the alleged unlawful activity, policy, or practice to the attention of MillHouse Foundation and provides MillHouse Foundation with a reasonable opportunity to investigate and correct the alleged unlawful activity. The protection described below is only available to individuals that comply with this requirement.

MillHouse Foundation shall not retaliate against any director, officer, staff or employee who, in good faith, has made a protest or raised a complaint against some practice of MillHouse Foundation or of another individual or entity with whom MillHouse Foundation has a business relationship, or on the basis of a reasonable belief that the practice is in violation of law, or a clear mandate of public policy.

MillHouse Foundation shall not retaliate against any director, officer, staff or employee who discloses or threatens to disclose to a supervisor or a public body any activity, policy, or practice of the corporation that the individual reasonably believes is in violation of a law, or a rule, or regulation mandated pursuant to law, or is in violation of a clear mandate of public policy concerning the health, safety, welfare, or protection of the environment.

## **ARTICLE V CONFIDENTIALITY**

### **5.0 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 shall be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

## **ARTICLE VI VIOLATIONS**

### **6.0 Handling of Reported Violations**

The board president or vice president shall notify the sender and acknowledge receipt of the reported violation or suspected violation within five days. The board, or its appointed committee, shall promptly investigate all reports and take appropriate corrective action, if warranted by the investigation.

This policy shall be made available to all directors, officers, staff or employees, and they shall have the opportunity to ask questions about the policy.

**CERTIFICATE OF ADOPTION OF CODE OF ETHICS AND WHISTLEBLOWER  
POLICY AND AGREEMENT**

I do hereby certify that the above stated Code of Ethics and Whistleblower Policy and Agreement for MillHouse Foundation were approved and adopted by the Board of Directors on February 21, 2019 and constitutes a complete copy of the Code of Ethics and Whistleblower Policy of the corporation.

Secretary Aimee Woolverton (hard copy on file)

Date: 03.02.19