

Whistleblower Protection Policy

Purpose

Without Limits ABA Therapy Inc is committed to the highest standards of ethics, integrity, and accountability in every aspect of our work. All directors, employees, volunteers, and representatives are expected to act honestly, responsibly, and in compliance with applicable laws and regulations. This Whistleblower Protection Policy ensures that serious concerns can be raised without fear of retaliation, and that issues are handled promptly, fairly, and confidentially.

Reporting Responsibility

It is the responsibility of every member of the Without Limits ABA Therapy Inc team—including board members, staff, and volunteers—to report concerns regarding:

- Violations of our Code of Ethics or policies.
- Suspected violations of federal, state, or local laws and regulations.
- Fraud, financial misconduct, discrimination, harassment, or any unethical behavior.

No Retaliation

Without Limits ABA Therapy Inc strictly prohibits retaliation against any individual who, in good faith, reports a concern or participates in an investigation. Retaliation includes termination, demotion, harassment, or any adverse action. Any employee found to have retaliated against a whistleblower will be subject to disciplinary action, up to and including termination.

Reporting Procedure

Open Door Approach: Employees are encouraged to first share concerns with their supervisor.

Alternative Options: If uncomfortable reporting to a supervisor, concerns may be submitted in writing directly to the Compliance Officer or the Executive Director.

Confidential Reports: Concerns may be submitted anonymously; confidentiality will be maintained to the fullest extent possible while still conducting a thorough investigation.

Compliance Officer Role

The designated Compliance Officer is responsible for receiving, investigating, and resolving all reported concerns. They will:

Ensure reports are handled promptly and fairly.

Notify leadership and/or the Board of Directors of reported issues and their resolution.

Provide periodic updates on compliance and whistleblower activities.

Acting in Good Faith

Reports must be made in good faith and with reasonable grounds for concern.

Allegations proven to be knowingly false or malicious will be treated as a serious violation of policy.

Confidentiality

Without Limits ABA Therapy Inc will maintain the confidentiality of reports to the greatest extent possible, consistent with the need to conduct a proper investigation.

Handling of Reported Violations

The Compliance Officer will acknowledge receipt of the concern.

An investigation will begin promptly, and appropriate corrective actions will be taken if warranted.

The reporting individual will be updated when feasible on the resolution of the matter.

By maintaining this Whistleblower Protection Policy, Without Limits ABA Therapy Inc ensures that every voice can be heard, and that ethical, transparent practices remain the foundation of our work with Xplorers, families, and the community.