



Reunite The Fight Inc. Whistleblower Policy

Effective Date: January 1st, 2025

Purpose

Reunite the Fight is committed to maintaining the highest standards of integrity, transparency, and accountability in all its operations. This Whistleblower Policy encourages employees, volunteers, board members, and other stakeholders to report suspected illegal, unethical, or improper conduct without fear of retaliation. The policy outlines procedures for reporting concerns and ensures that such reports are investigated promptly and fairly.

Scope

This policy applies to all employees, volunteers, board members, contractors, vendors, and other stakeholders of Reunite The Fight. It covers, but is not limited to, the following types of concerns:

- Financial misconduct, fraud, or theft
- Violations of federal, state, or local laws
- Breaches of the organization's Code of Conduct or policies
- Misuse of organizational assets or resources
- Discrimination, harassment, or unsafe working conditions
- Other unethical or improper activities

Policy

- **Reporting Responsibility**
All stakeholders are encouraged to report any suspected misconduct or violations promptly. Reports may be made anonymously, and the organization will strive to maintain confidentiality to the extent permitted by law.
- **No Retaliation**
Reunite The Fight strictly prohibits retaliation against anyone who, in good faith, reports a concern or participates in an investigation. Retaliation includes, but is not limited to, termination, demotion, harassment, or any adverse treatment. Any individual found to have retaliated will face disciplinary action, up to and including termination or removal from the organization.
- **Reporting Procedures**
 - **How to Report:** All employees, volunteers, or agents of [Nonprofit Organization Name] are encouraged to report any known or suspected violations of federal, state, or local laws, rules, or regulations to the

Reuniting Veterans in the bonds forged through the fire while shouldering the challenges of adversity.



appropriate governing body, including but not limited to state agencies (e.g., the Michigan Department of Attorney General's Charitable Trust Section) or law enforcement authorities. In accordance with the Michigan Whistleblowers' Protection Act (MCL § 15.361-369), the organization prohibits retaliation, including termination, demotion, or discrimination, against any individual who engages in such protected activity by reporting or planning to report violations to a public body, provided the report is made in good faith and not knowingly false. Reports should be made verbally or in writing to a designated public body, such as a state officer, agency, or law enforcement entity, to ensure compliance with applicable laws and to protect the public interest.

- Concerns may be reported to any of the following:
 - President or Vice President of the organization (unless they are involved in the concern)
 - Founder/CEO: [Scott Gatto scott@reunitethefight.org]
 - Board of Directors' designated representative: [Shelby Gatto] Chief Administration Officer, Board Chair Shelby@reunitethefight.org
 - Anonymous reporting option: [Matt Catron] Vice President Matt@reunitethefight.org
- **What to Include:** Provide as much detail as possible, including dates, individuals involved, and any supporting evidence.
- **Anonymous Reports:** Anonymous reports are accepted, but providing contact information may assist in the investigation.
- **Investigation Process**
 - **Receipt of Report:** The recipient of the report will promptly notify Dave Thompson, Program Administrator, dave@reunitethefight.org; who will determine the appropriate course of action.
 - **Investigation:** All reports will be investigated promptly, thoroughly, and impartially. External investigators may be engaged if necessary.
 - **Confidentiality:** The organization will protect the confidentiality of the whistleblower and investigation details to the fullest extent possible, consistent with the need to conduct an adequate investigation.
 - **Resolution:** Upon completion of the investigation, appropriate corrective action will be taken if warranted. The whistleblower will be informed of the outcome to the extent feasible, subject to confidentiality requirements.
- **Good Faith Reporting**

Reports must be made in good faith. Knowingly making false or malicious reports may result in disciplinary action.
- **Compliance with Laws**

This policy complies with applicable federal and state laws, including but not limited to the Sarbanes-Oxley Act and the Nonprofit Integrity Act (if applicable). The organization will cooperate fully with any legal or regulatory investigations.
- **Policy Communication and Training**

This policy will be communicated to all employees, volunteers, and board members

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upon adoption and annually thereafter. Training on the policy will be provided as part of onboarding and periodic compliance training.

Administration

The [Board of Directors is responsible for overseeing this policy. The Executive Director or their designee will ensure its implementation and periodic review. Questions about this policy should be directed to Shelby Gatto, Chief Administration Officer, shelby@reunitethefight.org.

Acknowledgment

All employees, volunteers, and board members are required to acknowledge receipt and understanding of this policy.

Scott Gatto