



## WHISTLEBLOWER POLICY

DC Central Kitchen is committed to the highest standards of excellence, integrity, safety, accountability, and respect. The organization both expects and requires its employees to report any suspected fraud, theft, safety violations, harassment, and other violations of DC Central Kitchen policy. This includes any violation of federal or state law.

In conjunction with this commitment and the organization's commitment to open communication, this policy aims to provide an avenue for employees to raise concerns and reassurance that they will be protected from reprisals or victimization for reporting concerns in good faith. DC Central Kitchen has engaged Lighthouse Services to provide an anonymous ethics and compliance hotline for all employees of DC Central Kitchen. The purpose of this service is to allow employees wishing to submit a report anonymously to do so. To anonymously report a violation of any of DCCK policies, federal, or state law, please contact Lighthouse at (855) 840-0070. Employees maintain the option of reporting any violation of DC Central Kitchen policy with senior management or human resources at their discretion.

Employees are encouraged to use the hotline service in cases where anonymity is desired. Please follow DCCK's standard practices, which are outlined in other sections of the Employee Handbook for all reports or issues not requiring anonymity.

The Whistleblower policy is intended to cover serious concerns that could have a significant impact on DC Central Kitchen. This policy applies to all DC Central Kitchen directors, managers, agents, and employees including part-time staff, temporary employees and those providing services to DC Central Kitchen pursuant to a contract. Examples of covered conduct may include, but are not limited to:

- Ethical Violations
- Threats
- Alcohol and Substance Abuse
- False Reimbursement Requests
- Wrongful Discharge
- Falsifying or Altering Employee Time



- Unsafe Working Conditions
- Bribery and Kickbacks
- Internal Controls
- Conflict of Interest
- Quality of Service
- Improper Conduct
- Vandalism and Sabotage
- Misuse of Company Property
- Sexual Harassment
- Theft and Embezzlement
- Discrimination
- Violation of the Law
- Conduct Violations
- Violation of Company Policy
- Fraud
- Falsification of Contract, Reports, or Records
- Fraud
- False Insurance Claims (such as worker compensation)

Additionally, violations of organizational policies and procedures must be reported: safety violations that could endanger staff or the general public; harassment by a supervisor, colleague or other persons (volunteers, clients, visitors); suspicions that a colleague, vendor or client may become violent; suspicions of drug or gun possession at work; inappropriate use of computer, data and technology systems (viewing pornography or other websites that are inappropriate or use of cellular phone/PDA device provided by DC Central Kitchen to perpetrate an act in violation of DC Central Kitchen policy). All



employees will be protected from any disadvantage or retaliation caused by raising good faith concerns or complaints. Anyone who retaliates against a complainant shall be subject to disciplinary actions.

Hotline Safeguards:

Harassment or Victimization:

Harassment or victimization of individuals submitting hotline reports will not be tolerated.

Confidentiality:

Every effort will be made to protect the reporter's identity by our hotline vendor. Please note that the information provided in a hotline report may be the basis of an internal and/or external investigation by DC Central Kitchen into the issue being reported. The policy allows employees to remain anonymous in disclosure of violations at their option; however, it is possible that as a result of the information provided in a report the reporter's identity may become known during the course of our investigation.

Bad Faith Allegations:

Although the reporter is not expected to prove the truth of an allegation, the employee submitting a report should demonstrate in their hotline report that there are sufficient grounds for concern or workplace violation. Malicious, dishonest, false, fabricated, or deceptive allegations may result in disciplinary action.

Investigation:

Reports are submitted by Lighthouse to the Executive Team of DC Central Kitchen, and will be investigated as soon as possible.

Follow-up action regarding matters submitted will be handled at the discretion of DC Central Kitchen management. The Executive Team shall receive a copy of each report and will follow-up, as deemed appropriate. Initial inquiries will be made to determine whether an investigation is appropriate, and the form that it should take. Some concerns may be resolved by agreed upon action without the need for an investigation. Further information may be sought from the reporter, witnesses, or the alleged offender with respect to any violation reported.

The final disposition of an investigation may or may not be disclosed at the discretion of D.C. Central Kitchen management.