

NeighborWorks America Whistleblower Procedures

Revised January 15, 2025

I. **SCOPE:** This procedure will be followed in response to Disclosures and Whistleblower Retaliation Complaints received consistent with the NeighborWorks America Whistleblower Policy.

II. DEFINITIONS

- **Anonymous Reporting System** – the third-party reporting system operated by Ethical Advocate, which permits Disclosing Individuals to submit concerns online or through a hotline.
- **Disclosure** – a report of potential misconduct or unlawful behavior.
- **Disclosing Individual** – the individual who submits a complaint or concern through the Anonymous Reporting System or other established reporting channels.
- **Whistleblower Retaliation Complaint** – a report of retaliation or adverse employment action resulting from an individual reporting a concern, cooperating with an investigation, or reporting concerns to the Enterprise Risk Management Committee.

III. ROLES & RESPONSIBILITIES

- **Ethics Officer** – the General Counsel or their designee; the Ethics Officer is responsible for implementation of the Whistleblower Policy and adherence to these procedures.
- **Vice President: Ethics & Compliance / Whistleblower Ombudsman** – position reporting to the Ethics Officer that is responsible for the response to Disclosures, including intake, creation of investigation plan, conducting investigations, making a recommendation about findings and corrective actions, and maintaining records on the investigation reports and their outcome. This position has primary responsibility for monitoring and administering the Anonymous Reporting System.

IV. PROCEDURES FOR DISCLOSURES FROM EMPLOYEES, FORMER EMPLOYEES, GRANTEES, CONTRACTORS, AND STAKEHOLDERS

Step 1: INTAKE & TRIAGE

<p>Promptly upon receipt</p>	<p>-- Upon receipt and review of any Disclosure (regardless of the channel or method by which the Disclosure was submitted), VP Ethics & Compliance will communicate with Disclosing Individual to acknowledge receipt of the Disclosure</p> <p>-- VP Ethics & Compliance will initiate a whistleblower intake report form summarizing the Disclosure allegations. VP Ethics & Compliance will assign each case a number using a consistent format [e.g. YYYY-001, YYYY-002, YYYY-003, etc].</p> <p>-- VP Ethics & Compliance will notify the Ethics Officer about the Disclosure, maintaining confidentiality consistent with the Whistleblower Policy. In all implementation of these procedures, the VP Ethics & Compliance may not respond to any inquiry or disclose any information from or about a Disclosing Individual, except to the extent that such a response or disclosure is made with the consent of the Disclosing Individual, made in accordance with the provisions of 5 USCA 552a, required by federal law, or necessary to conduct an investigation of the alleged reprisal.</p> <p>-- If the VP Ethics & Compliance determines at intake that the Disclosure presents a credible critical and immediate threat to NeighborWorks America, they immediately will escalate the concern to the Ethics Officer (or appropriate authority, based on their discretion) for response to mitigate risk pending investigation. "Critical and immediate threat" is defined as (1) a threat of violence or physical harm to a NeighborWorks America employee or others; or (2) a threat that has the potential imminently to disrupt NeighborWorks America operations.</p>
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Step 2: ASSESSMENT

<p>Within 7 calendar days of receipt</p>	<p>--VP Ethics & Compliance will determine whether the Disclosure:</p> <ul style="list-style-type: none">■ requires additional information for proper assessment and seek additional information from the reporter.■ fails to allege misconduct or unlawful behavior under the Whistleblower or related Policies■ has previously been addressed and take the appropriate steps to close out the matter with the reporter <p>Note: All Whistleblower Retaliation Complaints shall be investigated. Other Disclosures shall be investigated as appropriate, referred to the proper department for handling, or closed out with the reporter.</p> <p>--The threshold assessment will determine: (1) whether the matter is referred for investigation or whether it is closed out; and (2) if referred for investigation, the specific allegations and concerns to be investigated.</p> <p>-- If there is insufficient detail to complete the threshold determination, VP Ethics & Compliance will request additional information from the Disclosing Individual. Additional information may be requested from the Disclosing Individual either directly or – if the complaint was made anonymously – via the Anonymous Reporting System. The request will indicate that if additional necessary details are not provided within 14 calendar days from the Disclosing Individual, the matter may be closed out.</p> <p>-- Ethics Officer will brief the Chief Executive on the Disclosure, maintaining confidentiality consistent with the Whistleblower Policy. Additionally, the Chief Audit Officer will be made aware of the intake of new Disclosures and, if the Disclosure involves a financial or controls-related concern, will be similarly briefed.</p>
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<p>Upon completion of the initial assessment</p>	<p>--Investigation Assignment/Referral:</p> <ul style="list-style-type: none">■ Subject to the exceptions below, the VP Ethics & Compliance will investigate all Disclosures of suspected or alleged misconduct or unlawful behavior.■ The VP Ethics & Compliance will conduct investigations of alleged whistleblower retaliation via an “Ethical Firewall” independent from input, guidance and direction NeighborWorks America leadership or management (i.e. leadership will not receive notice, updates or other information regarding the ongoing investigation. This does not excuse leadership/ management from providing information as a potential witness or subject of such investigation).■ The Ethics Officer and VP Ethics & Compliance will, under the appropriate circumstances, refer an investigation to an external investigator. Referral factors include:<ul style="list-style-type: none">➢ The Disclosure credibly alleges direct involvement in, or knowledge of, potential misconduct by the Board of Directors, CEO, Ethics Officer, VP Ethics & Compliance, or any Officer or SVP who reports directly to the CEO.➢ Investigation requires technical expertise not available to the VP Ethics & Compliance.■ When the Ethics Officer and VP Ethics & Compliance determine that an investigation should be handled externally, the VP Ethics & Compliance will select an appropriate external investigation resource from a pre-screened, pre-approved pool of qualified contractors. The VP Ethics & Compliance will coordinate with the selected contractor, who will follow the NeighborWorks Procedure in conducting the investigation and reporting the results of the investigation to the VP Ethics & Compliance and the Ethics Officer. <p><u>Matters outside the scope of the Whistleblower Policy</u></p> <ul style="list-style-type: none">■ Disclosures that are assessed and deemed to fall outside the scope of the Whistleblower Policy, but which may require further review and/or action should be referred to the appropriate department. For example, a complaint about unreasonable workload or a minor interpersonal dispute should be referred to SVP Human Resources to handle as appropriate.
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	<p>--VP Ethics & Compliance will alert the Ethics Officer to the outcome of the Threshold Determination, maintaining confidentiality consistent with the Whistleblower Policy</p>
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Step 3: INVESTIGATION

<p>Promptly following the referral for investigation</p>	<p>For matters that are referred for internal investigation, the VP Ethics & Compliance will create an investigation plan. The creation of the plan will be completed behind an “ethical firewall” -- meaning the VP Ethics & Compliance performs this work independently, and walled off from the direction, guidance, or influence of NeighborWorks America Management.</p> <p>The plan may include any or all of the following methods of investigation:</p> <ul style="list-style-type: none"> ■ document review ■ interviews ■ email review ■ review of additional documents provided by the Disclosing Individual or others ■ review of security camera footage ■ legal research performed by the Office of General Counsel or outside counsel ■ requests for special support from technical experts (for example: information technology or accounting experts) <p>The VP Ethics & Compliance will document the investigation plan on the report form.</p>
<p>Within 30 calendar days following the referral for investigation</p>	<p>--The VP Ethics & Compliance or external investigator will conduct the investigation, maintaining complete records of the investigation. Where an investigation cannot be completed within 30 calendar days, the VP Ethics & Compliance or external investigator will provide a status update to the Ethics Officer at 30 days and every 14 days thereafter.</p> <p>--If the VP Ethics & Compliance has a concern that a Disclosing Individual has deliberately and knowingly reported false information, that will be treated as a separate concern requiring additional investigation as necessary and a report separate from the findings of the original investigation. The VP Ethics &</p>

	Compliance will submit the report, with any recommendation, to a review committee consisting of the Ethics Officer, Chief Audit and SVP Human Resources.
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Step 4: DETERMINATION / CORRECTIVE ACTION

<p>At conclusion of the investigation</p>	<p>--The investigator will present findings of fact and recommended disciplinary or corrective actions in a written report to the Ethics Officer and the SVP Human Resources. The Ethics Officer and SVP Human Resources will, if necessary, recommend revisions to the disciplinary or corrective actions until the investigator, Ethics Officer and SVP Human Resources reach consensus on disciplinary or corrective action.</p> <p>The matrix below is a guideline for ensuring that corrective action is appropriate and consistent. Final determinations will be based on appropriately documented facts and circumstances of each investigation.</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th style="background-color: #f4a460;">FINDING</th> <th style="background-color: #f4a460;">DISCIPLINARY OR CORRECTIVE ACTION</th> </tr> </thead> <tbody> <tr> <td>(A) Substantiated allegations of gross mismanagement, gross waste of funds, abuse of authority, violation of law/rule/regulation (including the competition for or negotiation of a contract or grant), fraud, substantial and specific danger to public health or safety</td> <td>--Referral to law enforcement, DOJ, or FBI as appropriate --Seeking restitution of funds --Disciplinary action, up to and including termination</td> </tr> <tr> <td>(B) Substantiated allegation of whistleblower reprisal</td> <td>-- Require affirmative action to abate the reprisal -- Reinstatement of the person to the position that the person held before the reprisal, together with compensatory damages, employment benefits, and other terms and conditions of employment that would apply to the person in that position if the reprisal had not been taken -- Require payment to the Disclosing Individual equal to the</td> </tr> </tbody> </table>	FINDING	DISCIPLINARY OR CORRECTIVE ACTION	(A) Substantiated allegations of gross mismanagement, gross waste of funds, abuse of authority, violation of law/rule/regulation (including the competition for or negotiation of a contract or grant), fraud, substantial and specific danger to public health or safety	--Referral to law enforcement, DOJ, or FBI as appropriate --Seeking restitution of funds --Disciplinary action, up to and including termination	(B) Substantiated allegation of whistleblower reprisal	-- Require affirmative action to abate the reprisal -- Reinstatement of the person to the position that the person held before the reprisal, together with compensatory damages, employment benefits, and other terms and conditions of employment that would apply to the person in that position if the reprisal had not been taken -- Require payment to the Disclosing Individual equal to the
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<p>Upon completion of the Corrective Action</p>	<p>The responsible Officer responsible will submit documentation of the completed Corrective Action(s) to the VP Ethics & Compliance who review and note the matter is “CLOSED.”</p>				

Step 5: CLOSE OUT

<p>Promptly upon CLOSE OUT as outlined in “Step 4” above</p>	<p>-- VP Ethics & Compliance will ensure all records are complete, correctly labeled, and saved to a secure location:</p> <ul style="list-style-type: none"> ■ Initial Disclosure ■ All communications with the Disclosing Individual
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	<ul style="list-style-type: none"> ■ Report form, including explanation of threshold determination ■ Investigation plan ■ All supporting investigation materials ■ Investigation report and findings of fact ■ Resulting corrective actions <p>--Upon CLOSE OUT, case file records will be maintained in a restricted location with access provided to the following individuals: Ethics Officer, VP Ethics & Compliance, and Chief Audit Executive. (Note: file access shall be removed for any matter in which one of those individuals is implicated.)</p>
<p>6 months after case closure. completion of the Corrective Action</p>	<p>VP Ethics & Compliance will review the matter to ensure non-retaliation and confirm that any ongoing Corrective Action is in place and, where applicable, incorporated into ongoing operations.</p>

V. COMMUNICATION DURING THE WHISTLEBLOWER PROCEDURES

COMMUNICATION WITH DISCLOSING INDIVIDUAL

<p>Promptly upon receipt</p>	<p>Regardless of method by which the report was submitted, including the anonymous reporting system, VP Ethics & Compliance will communicate with Disclosing Individual to acknowledge receipt of the Disclosure.</p> <p><i>For example: “Thank you for making a report. I am writing to confirm receipt. Your report will be reviewed, and appropriate action will be taken. I will contact you if we require additional information.”</i></p> <p>Initial responses to reporters utilizing the Anonymous Reporting System will acknowledge the response, encourage the Disclosing Individual to use the system to check in regularly and note that if additional information is necessary to investigate further, a failure to respond within 14 days may result in closure of the matter.</p>
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	<p>For example: <i>“Thank you for making a report. This will confirm receipt. Your report will be reviewed, and appropriate action will be taken. Please log into your report account frequently for updates or if you have questions. If additional information is requested, please respond promptly (within 14 calendar days) to avoid potential closure of the matter.”</i></p>
<p>After receipt and through CLOSE OUT as outlined in “Step 4” above</p>	<p>VP Ethics & Compliance will regularly communicate the status of the investigation to the Disclosing Individual <u>at least once every 14 calendar days</u> or on a schedule agreed by the Disclosing Individual. Communication may occur by direct email, via the Anonymous Reporting System, or by other method agreed to by the VP Ethics & Compliance and the Disclosing Individual.</p> <p>For example: <i>“I am writing to confirm that review and investigation of this matter is still ongoing. Please let me know if you have any questions.”</i></p> <p>During the investigation the VP Ethics & Compliance will promptly respond to any communications from the Disclosing Individual including follow-up received via the Anonymous Reporting System.</p>
<p>Promptly upon CLOSE OUT as outlined in “Step 4” above</p>	<p>VP Ethics & Compliance will communicate to the Disclosing Individual whether their allegations or concern was (1) substantiated, partially substantiated, or unsubstantiated; and (2) whether corrective action(s) was taken in response to their Disclosure.</p> <p>Example A: <i>“Thank you again for making a Disclosure regarding [insert matter]. The matter was investigated and a violation of policy/procedure was substantiated and corrective action has been taken.”</i></p>
<p>Promptly upon CLOSE OUT as outlined in “Step 4” above and continuing for at least six months or beyond as necessary</p>	<p>NeighborWorks America (through its VP Ethics & Compliance) periodically will follow up with reporters of Whistleblower concerns at least once every 60 days for a minimum of six (6) months following the conclusion of the investigation, unless it is the subject of pending litigation. Such communication will seek to ensure the Disclosing Individual is supported following the investigation and not experiencing retaliation.</p>

<p>following CLOSE OUT</p>	<p>For example: “I am writing to follow-up on your Whistleblower Complaint/Concern. Please let me know if there is anything I can do to support you during this time. Also, please remember that NeighborWorks America does not tolerate retaliation. Please notify me promptly if you believe you have been subject to any further retaliation for your having made a Disclosure under the Whistleblower Policy.”</p>
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COMMUNICATION WITH OTHERS

<p>Promptly following the referral for investigation</p>	<p>-- As noted above, Ethics Officer will brief the CEO upon intake of a new Disclosure and make the Chief Audit Officer aware that new Disclosures have been made. If the Disclosure involves a financial or controls-related concern, the Chief Audit Officer will be similarly briefed. Both the CEO and Chief Audit Executive will be briefed upon the intake of a Whistleblower Retaliation Complaint. All briefings will maintain confidentiality consistent with the Whistleblower Policy.</p> <p>-- Ethics Officer will determine whether the Disclosure includes allegations of wrongdoing that require a referral to local law enforcement or DOJ and will make such referral.</p>
<p>Upon completion of the investigation, <u>and no later than 180 days after receiving the initial complaint</u></p>	<p>The Ethics Officer will brief the Audit Committee of the Board of Directors. If the matter remains open at the time of the briefing updates will be provided to the Board until the matter is closed.</p>
<p>Promptly upon CLOSE OUT as outlined in “Step 4” above</p>	<p>VP Ethics & Compliance will communicate with witnesses, staff who cooperated with the investigation, and the individual(s) who were the subject of the Disclosure to inform them: (1) if the complaint was substantiated, partially substantiated, or unsubstantiated; and (2) whether corrective action(s) was taken in response to the Disclosure</p> <p>For example: “I am writing to inform you of the outcome of the investigation regarding [insert matter]. Upon completion of the investigation, it was found that the allegation was substantiated. Corrective action has been taken.”</p>

Annually	Ethics Officer will report to the Audit Committee in Executive Session summarizing all Disclosures received and investigations completed that year pursuant to these procedures.
Generally	The NeighborWorks America Whistleblower Policy and Whistleblower Procedures are available on the NeighborWorks America external website: neighborworks.org

VI. MISCELLANEOUS: Any questions about these procedures and their application should be directed to the Ethics Officer.