

N STREET VILLAGE

Whistleblower Policy

General

N Street Village requires directors, officers, and employees to observe the highest standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of N Street Village, we commit to acting honestly and with integrity in fulfilling our responsibilities and to comply with all applicable laws and regulations.

The purpose of this policy is to encourage all participants to disclose any wrongdoing that may adversely impact N Street Village, its clients and stakeholders, or the public at large. It is the duty of all directors, officers, and employees to report violations or suspected violations in accordance with this policy.

Definitions

Good faith. Good faith is evident when the report is made without malice or consideration of personal benefit and the complainant has a reasonable basis to believe that the report is true; provided, however, that a report does not have to be proven to be true to be made in good faith. Good faith is lacking when the disclosure is known to be malicious or false.

Wrongdoing. Examples of wrongdoing include, but are not limited to, fraud, including financial and accounting fraud, violation of laws and regulations, violations of N Street Village bylaws and policies, unethical behavior or practices, endangerment to public health or safety, and negligence of duty.

Adverse employment action. Examples of adverse employment action include, but are not limited to, demotion, suspension, termination, transfer to a lesser position, denial of promotions, denial of benefits, threats, harassment or denial of compensation as a result of the employee's report of wrongdoing, or any manner of discrimination against an employee in the terms and conditions of employment because of any other lawful act done by the employee pursuant to this policy.

No Retaliation

No director, officer or employee who in good faith reports wrongdoing shall suffer any adverse employment action. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within the organization prior to seeking resolution outside the organization.

Reporting Violations

Employees shall first share their questions, concerns, suggestions, or complaints concerning violations with the person who can address them properly, which in most cases is the supervisor of the alleged wrongdoer. However, those employees not comfortable speaking with the supervisor or those employees not satisfied with the supervisor's response are encouraged to report the concern to the Executive Director. Should the concern involve suspected fraud, the Executive Director, or a member of the board

of directors, or if the reporting party is uncomfortable making the report to the Executive Director, then such concerns should be taken directly to N Street Village's Compliance Officer within five business days of the discovery of the incident or the response from the supervisor. The chair of the Audit Committee serves as N Street Village's Compliance Officer. Should the complaint concern the Compliance Officer, notice should be given to the Chair of the Board of Directors. Contact information for both of these officers is posted on the employee notice board.

Anyone filing a complaint must be acting in good faith and have reasonable grounds for believing the information disclosed indicates wrongdoing. Allegations that prove not to be substantiated and which are shown to have been made maliciously or knowingly to be false will be the basis for serious disciplinary action.

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously to the Compliance Officer. Reports of suspected wrongdoing will be kept confidential to the extent possible, consistent with the need to conduct an adequate and thorough investigation.

Investigation and Resolution

The Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning violations of this policy and shall send notification of receipt of the report to the complainant (if known) within five business days. The Executive Director shall report to the Compliance Officer all complaints of which s/he is aware within five business days of becoming aware of the complaint.

The following factors shall be considered in determining whether management or the Audit Committee should investigate an allegation:

Who is the alleged wrongdoer? If an executive officer, senior financial officer or other senior management employee is alleged to have engaged in wrongdoing, the Audit Committee shall perform the investigation. Allegations regarding other employees may properly be handled by management.

How serious is the wrongdoing? If, for example, the alleged action would constitute a violation involving the integrity of the financial statements of the organization, the Audit Committee should conduct the investigation, making use of legal counsel where appropriate and necessary.

The Compliance Officer has direct access to the Audit Committee of the board of directors and shall work with them until the matter is resolved and appropriate corrective action taken if warranted. The Compliance Officer is required to report to the Audit Committee at least annually on compliance activity.

Contact Information 2018-2019

Compliance Officer: Michael Freedman, 301-664-9323
Board Chair: Peter Shields, 202-719-3249