

Whistleblower Protection Policy

Plast Ukrainian Scouting Organization USA ("Plast USA") requires directors, officers, volunteers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of Plast USA, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

This Whistleblower Policy is intended to encourage and enable members, employees, volunteers, campers and others to raise serious concerns internally so that Plast USA can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees and volunteers to report concerns about violations of Plast USA's code of ethics or suspected violations of law or regulations that govern Plast USA''s operations.

No Retaliation

It is contrary to the values of Plast USA for anyone to retaliate against any board member, officer, member, camper, employee or volunteer who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of Plast USA. An employee, director, volunteer or member who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment, removal from the post that they hold or removal from the organization.

Reporting Procedure

Plast USA has an open door policy and suggests that members, employees, volunteers, campers and others share their questions, concerns, suggestions or complaints with their supervisor, branch director (stanychnyj) or camp director (head of OTK). If an individual is not comfortable speaking with a supervisor, branch director (stanychnyj) or camp director (head of OTK) or is not satisfied with the supervisor's response, he/she/they are encouraged to speak with the Chair of the Board of Directors (Holova KPS) and General Counsel. Supervisors and managers are required to report complaints or concerns about suspected ethical and legal violations in writing to the Plast USA's Chair of the Board of Directors (Holova KPS) and General Counsel who have the responsibility to investigate all reported complaints. Members, employees, volunteers, campers and others with concerns or complaints may also submit their concerns in writing

directly to their supervisor or the Chair of the Board of Directors (kps-holova@plastusa.com) and General Counsel (generalcounsel@plastusa.com). Members, employees, volunteers, campers and others with concerns or complaints about the Chair of the Board of Directors may submit their concerns in writing directly to the General Counsel; if the complaint or concerns pertain to the General Counsel, the complaint may be submitted in writing directly to the Chair of the Board of Directors (Holova KPS).

Handling of Reported Violations

The Chair of the Board of Directors (Holova KPS) and/or General Counsel will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation within 72 hours of receipt. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

Investigation of Complaints

Plast USA's Chair of the Board of Directors (Holova KPS) and General Counsel are responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved.

Investigations must be completed within one (1) month of the date of reporting, unless additional time is required. In the event an investigation cannot be completed within one month, the complainant will be notified that additional time is required to complete the investigation, provide an estimate of time within which the Chair (or other individual tasked with investigating a complaint) in good faith believes the investigation will be completed. This notice shall also provide an explanation for the need for additional time.

The Chair of the Board of Directors (Holova KPS) and General Counsel will send notice of the result of their investigation to the complainant when the investigation is completed, within the timeframe referenced above.

The Chair of the Board of Directors (Holova KPS) and General Counsel will advise the Board of Directors of all complaints and their resolution and will report at least annually to the Treasurer on complaint and concerns relating to accounting or alleged financial improprieties.

Accounting and Auditing Matters

Plast USA's Chair of the Board of Directors (Holova KPS) and/or General Counsel shall immediately notify Treasurer of any concerns or complaint regarding corporate accounting practices, internal controls or auditing and work with the Treasurer until the matter is resolved.

Acting in Good Faith

Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

Confidentiality

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

Plast Ukrainian Scouting Organization USA
Policy approved by the Board of Directors on 12/18/2024
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