Maharashtra Foundation Whistleblower Protection Policy

Maharashtra Foundation requires directors, officers, employees, and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the Maharashtra Foundation, 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 employees, volunteers, and others associated with Maharashtra Foundation to raise serious concerns internally so that the Foundation 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 Maharashtra Foundation's code of ethics or suspected violations of law or regulations that govern Maharashtra Foundation's operations.

No Retaliation

It is contrary to the values of Maharashtra Foundation for anyone to retaliate against any board member, officer, employee, or volunteer who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, suspected fraud, or suspected violation of any regulation governing the operations of Maharashtra Foundation. An individual who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment or association with the Foundation.

Reporting Procedure

Maharashtra Foundation has an open-door policy and suggests that employees and volunteers share their questions, concerns, suggestions, or complaints with their immediate supervisor or the relevant project coordinator.

If you are not comfortable speaking with your supervisor/project coordinator or you are not satisfied with their response, you are encouraged to speak with the **President** or a **Board Member**.

Supervisors and managers are required to report complaints or concerns about suspected ethical and legal violations in writing to the Maharashtra Foundation's **Compliance Officer** (or designated individual), who has the responsibility to investigate all reported complaints.

Employees and volunteers with concerns or complaints may also submit their concerns in writing directly to their supervisor, the President, or the organization's Compliance Officer.

Compliance Officer

The Maharashtra Foundation's **Compliance Officer** is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Compliance Officer will advise the Board of Directors of all complaints and their resolution and will report at least annually to the Board of Trustees on compliance activity relating to accounting or alleged financial improprieties.

Accounting and Auditing Matters

The Maharashtra Foundation's Compliance Officer shall immediately notify the Board of Directors of any concerns or complaint regarding corporate accounting practices, internal controls, or auditing and work with the responsible officers 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.

Handling of Reported Violations

The Maharashtra Foundation's Compliance Officer will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation.

Compliance Officer:

Name: Reshma Sambare

Title/Organization: Board Member, Maharashtra Foundation

Contact information: reshmasambare@maharashtrafoundation.org / +1 248.275.3653

Policy approved by the Board of Directors on Aug 20, 2025.