

# Whistleblower Protection Policy

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

## **No Retaliation**

It is contrary to the values of Restless Books 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, or suspected fraud, or suspected violation of any regulation governing the operations of Restless Books. 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.

## **Reporting Procedure**

Restless Books has an open door policy and suggests that board members, employees and volunteers share their questions, concerns, suggestions or complaints with their supervisor. If you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak directly with Restless Books's Compliance Officer. Supervisors and managers are required to report complaints or concerns about suspected ethical and legal violations in writing to the Restless Books's Compliance Officer, who has the responsibility to investigate all reported complaints. Employees, board members, and volunteers with concerns or complaints may also submit their concerns in writing directly to the Alternate Compliance Officer. Employees, board members, and volunteers whose concerns or complaints involve Restless Books' Compliance Officer may write directly to the Alternate Compliance Officer, who has the responsibility to investigate reported complaints pertaining to the Compliance Officer.

## **Compliance Officer**

Restless Books' 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 Chair of the Finance Committee on compliance activity relating to accounting or alleged financial improprieties.

### **Accounting and Auditing Matters**

The Restless Books' Compliance Officer shall immediately notify the Finance Committee of any concerns or complaint regarding corporate accounting practices, internal controls or auditing and work with the committee 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 Restless Books' 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:**

Ilan Stavans

Publisher / Restless Books

[istavans@amherst.edu](mailto:istavans@amherst.edu) / (413) 519-4376

### **Alternate Compliance Officer**

Annette Hochstein

Board Chair / Restless Books

[annette.hochstein@gmail.com](mailto:annette.hochstein@gmail.com) / +0544218880

**Policy approved by the Board of Directors on April 12, 2024.**