



Whistleblower Policy

I. General

SparkPath (the "Organization") expects its Board of Directors ("Governing Body of SparkPath"), BrightWorks employees assigned to work for SparkPath ("Staff"), and other representatives to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of SparkPath, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

II. Reporting Responsibility

It is the responsibility of the Board of Directors, Staff, and other representatives to report Wrongful Conduct in accordance with this Whistleblower Policy.

III. Wrongful Conduct

"Wrongful Conduct" is defined in this Whistleblower Policy to include: a serious violation of SparkPath policy; a violation of applicable state and federal law; or the use of SparkPath property, resources, or authority for personal gain or other non-organization-related purpose except as provided under SparkPath policy.

This definition of Wrongful Conduct is not intended to be an exclusive listing of the illegal or improper activity encompassed by the Whistleblower Policy. Rather, the Whistleblower Policy is intended to serve as a means of reporting all serious improprieties that potentially impact the integrity and effective operation of SparkPath and the well-being of participants.

IV. No Retaliation

No member of the Board of Directors or Staff who in good faith reports Wrongful Conduct will suffer harassment, retaliation, or adverse employment consequences. Any member of the Board of Directors or Staff who retaliates against anyone who has reported Wrongful Conduct in good faith is subject to discipline up to and including termination of employment or removal from the Board of Directors, as applicable. This Whistleblower Policy is intended to encourage and enable Staff and others to raise serious concerns within SparkPath prior to seeking resolution outside SparkPath.

V. Reporting Wrongful Conduct

SparkPath encourages its Board of Directors, Staff, and other representatives to share their questions, concerns, suggestions, or complaints with someone who can address them properly. Any

member of the Board of Directors, Staff, or other representative may report Wrongful Conduct to the CEO of SparkPath, the Director of SparkPath, or the Chair of the SparkPath Board of Directors. If the Wrongful Conduct implicates the CEO of SparkPath, the Director of SparkPath, or the Chair of the SparkPath Board of Directors, or if the reporting individual is not comfortable speaking with or not satisfied with the response of the foregoing individuals, the issue may be reported to any member of the Board of Directors. The CEO of SparkPath, the Director of SparkPath or the Chair of the SparkPath Board of Directors, and all members of the Board of Directors to whom a report of Wrongful Conduct is made are required to immediately advise the full Board of Directors of such report of Wrongful Conduct.

VI. Acting in Good Faith

Anyone filing a complaint of Wrongful Conduct must be acting in good faith and have reasonable grounds for believing the information disclosed indicates Wrongful Conduct. 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 offense warranting disciplinary action.

VII. Confidentiality

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

VIII. Handling of Reported Wrongful Conduct

A representative of the Board of Directors will notify the sender and acknowledge receipt of the reported Wrongful Conduct or suspected Wrongful Conduct within five business days unless such report was submitted anonymously. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

SparkPath Oct 2009
Revised April 2015
Revised April 2024