

# Whistleblower Policy

## Officers, Employees, and Agents

**Effective Date:** November 1, 2023

**Policy Authority:** Executive director, Election Trust Initiative

**Applicable Jurisdiction:** US

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**Purpose of the Policy:** The Election Trust Initiative, LLC (the Initiative) is committed to openness, integrity, responsibility, accountability, and lawful and ethical behavior in all its activities. This commitment requires that all Initiative officers, employees, and agents (including but not limited to consultants and contractors) conduct themselves in a manner that complies with both the letter and the spirit of all applicable laws and Initiative policies (together referred to as “Initiative’s Rules”).

To honor this commitment, you must immediately report if you observe, experience, or learn of a possible violation of Initiative’s Rules even if it may appear to you that the conduct involved is helping to achieve an Initiative goal. Our goals are to be achieved only through the highest level of ethical conduct. Failure to report a possible violation of Initiative’s Rules may result in disciplinary measures up to and including termination of employment or other relationship with the Initiative.

This policy aims (i) to provide you with an avenue for raising concerns regarding potential unlawful or unethical behavior and (ii) to reassure you that you will be protected from reprisal as a consequence of reporting any alleged wrongdoing.

### **Details of the Policy Statement:**

#### **Reporting Concerns**

If you have a good faith concern regarding the legality or ethical propriety of any action taken or contemplated to be taken by the Initiative or one of its officers, employees, or agents, or if you have a good faith belief that action needs to be taken to ensure compliance with Initiative’s Rules, please promptly raise the matter through one of the following ways:

First consider speaking to your supervisor or contact at the Initiative.

If you are not comfortable speaking with your supervisor or contact or you are not satisfied with your supervisor or contact’s response, you are encouraged to speak with the executive director or president of the Initiative.

If you are not comfortable with this option, you may report a possible violation anonymously or non-anonymously through the Initiative’s ethics and compliance hotline at 1-833-479-4944 or website at [electioninitiative.ethicspoint.com](http://electioninitiative.ethicspoint.com) which is hosted by an independent third party. This means that if you call the hotline, you will speak with a representative of that third party.

## **Types of Reportable Conduct**

The following is a summary of the types of conduct you are obligated to report:

- any matter involving impropriety in accounting, internal accounting controls, or auditing matters, including:
  - fraud, deliberate error, or misrepresentation (oral or written) in the preparation, maintenance, evaluation, review, or audit of any financial statement, financial record, or other public document, including information consolidated in The Pew Charitable Trusts tax return (Form 990);
  - deficiencies in or non-compliance with the Initiative's internal accounting controls, policies, or procedures; or
  - providing false information to or withholding material information from internal or external auditors;
- embezzlement or other private benefit (i.e., Initiative assets being diverted for any person's own benefit);
- violation of other of Initiative's Rules (e.g., Initiative's ethics policies);
- payment for services or goods that are not rendered or delivered; or
- facilitating or concealing any of the above or similar actions.

All concerns raised will be reported to the Initiative's president as soon as practicable.

Anyone who raises a concern about possible unlawful or unethical conduct must act in good faith and have reasonable grounds for believing that the information disclosed indicates such impermissible conduct. Anyone who raises an allegation that is both (i) not confirmed and (ii) made maliciously, knowing that it is not true, or with reckless disregard for its truth, will be subject to serious disciplinary action up to and including termination and any other available legal remedies.

## **Investigation**

The Initiative will ensure that all reported concerns are thoroughly investigated per this policy and take appropriate corrective action if warranted. All reports will be treated confidentially and as discreetly as reasonably possible, consistent with the Initiative's need to conduct an adequate investigation, implement any remedies, and satisfy legal obligations.

## **No Retaliation**

The Initiative strictly prohibits retaliation of any kind (including but not limited to compensation or terms, conditions, location, or privileges of employment) against anyone who in good faith reports or raises concerns under this policy. The Initiative likewise strictly prohibits retaliation against any individual for participating or cooperating in good faith in any investigation.

Any person who threatens or retaliates against another individual who in good faith reports a possible or actual violation per this policy may be subject to appropriate remedial and/or disciplinary measures up to and including termination of their employment or other relationship with the Initiative and possibly civil and/or criminal liability. This non-retaliation policy is designed to assure every officer, employee, and agent that the Initiative seriously encourages and relies on their open and frank communication of genuinely held concerns about possible unlawful or unethical conduct, regardless of how these concerns are reported or raised.

This policy of non-retaliation applies to all reports made in good faith, even if no wrongdoing is ultimately found. It does not, however, apply to any allegation that is both (i) not confirmed and (ii) made maliciously by a person either knowing that it is not true or with reckless disregard for its truth.

The Initiative reserves the right to amend and/or supplement this policy at any time.

**Designated Policy Contact:** The following individual should be contacted for interpretations, resolution of problems, and special situations.

**Title:** Ashley Quarcoo, Executive director, Election Trust Initiative