



## Whistleblower Protection Policy

HomeWord 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 the HomeWord name, 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 HomeWord 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 HomeWord's code of ethics or suspected violations of law or regulations that govern HomeWord's operations.

### No Retaliation

It is contrary to the values of HomeWord 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 HomeWord. 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

HomeWord has an open-door policy and suggests that employees 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 with Cindy Ward, Director of Operations. Supervisors and managers are required to report complaints or concerns about suspected ethical and legal violations in writing to the President, Jim Burns, or Todd Dean, Chairman of the Board, who has the responsibility to investigate all reported complaints. Employees with concerns or complaints may also submit their concerns in writing directly to their supervisor or the Director of Operations or Chairman of the HomeWord Board.

### Director of Operations

HomeWord's Director of Operations is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Director of Operations will advise the President and/or Board Chair of all complaints and their resolution and will report at least annually to the Chairman of the Board on compliance activity relating to accounting or alleged financial improprieties.

### Accounting and Auditing Matters

Director of Operations shall immediately notify the Board of Directors 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**

HomeWord's Director of Operations 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.

Marcus Preciado  
President, HomeWord  
[marcus@homeword.com](mailto:marcus@homeword.com)  
PO Box 1600  
San Juan Capistrano, CA 92693