

MII Whistleblower Policy

MII recognizes the important role whistleblowers play in society. Our internal operations reflect the same commitment to identifying and reporting issues of concern. All employees, contractors, volunteers, interns, and other agents of MII are covered by this policy.

No Retaliation

No employee, contractor, volunteer, intern, and other agent of MII who in good faith reports a violation of an MII policy or any applicable laws, rules, or regulations shall suffer harassment, retaliation, or adverse employment consequences as a result of their good-faith reporting. Any agent of MII who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This whistleblower policy is intended to encourage and enable employees and others to raise serious concerns within the organization prior to seeking resolution outside the organization.

Reporting Violations

MII recommends that all agents of MII share their questions, concerns, suggestions, or complaints with their supervisor. However, if an individual is not comfortable speaking with their supervisor or not satisfied with a supervisor's response, employees are encouraged to speak with the executive director. Supervisors and managers are required to report suspected violations of MII policy and applicable laws, rules, or regulations to the executive director, who is designated as the organization's compliance officer with the responsibility to investigate all reported violations. If the complaint is against the executive director, then the individual should share their concerns with any member of the board of directors. The phone numbers and email addresses of the directors can be found [here](#).

Accounting and Auditing Matters

The board of directors shall address all reported concerns or complaints regarding corporate accounting practices, internal controls, or auditing. The compliance officer shall immediately notify the board of any such concern or complaint and shall work with the board until the matter is resolved.

Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation of MII policy or any applicable law, rule, or regulation must be acting in good faith and have reasonable grounds for believing such a violation has occurred. Any allegation that proves unsubstantiated or to have been made maliciously or falsely will be viewed as a serious disciplinary offense.

Confidentiality

Violations or suspected violations may be reported confidentially or anonymously 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 compliance officer will notify the complainant and acknowledge receipt of the report of a violation or suspected violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.