

The Atkinson Foundation expects its directors and officers to observe high standards of business and personal ethics in the conduct of their responsibilities on behalf of the Foundation and to comply with all applicable laws and regulations as well as the policies of the Foundation.

This policy is intended to encourage and enable directors to raise serious and responsible concerns about the conduct of the Foundation's business without retaliation

It is the policy of the Atkinson Foundation that any director who has reason to believe or suspect that any wrongful conduct is occurring in the conduct of the Foundation's affairs, whether intentionally or unintentionally, should bring the matter to the attention of the Board President, or any other Officer of the Board. Wrongful conduct is defined, but not limited to, fraud, malfeasance, bribery, theft, coercion, harassment or misuse of the Foundation's property and facilities.

A director who, in good faith, reports such suspected wrongful conduct shall not suffer harassment, retaliation or any other adverse consequences as a result of such action.