

Cave Research Foundation, Inc.

Whistleblower Policy

Part I: General

The Cave Research Foundation (“The Organization”) requires Directors, officers, volunteers, and employees to observe high standards of good business and personal ethics in the conduct of their duties and responsibilities. As representatives of the Organization, they must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

Part II: Reporting Responsibility

It is the responsibility of all Directors, officers, volunteers, and employees to report violations or suspected violations of normal business ethics and standards in accordance with the Whistleblower Policy.

Part III: No Retaliation

No Director, officer, volunteer, or employee (“the individual”) who in good faith reports a violation of good business or personal ethics shall suffer harassment, retaliation, or adverse employment consequence. Anyone who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment or position (Operations Manager, Director, etc.). This Whistleblower Policy is intended to encourage and enable individuals to raise serious concerns within the Organization prior to seeking resolution outside the Organization.

Part IV: Reporting Violations

Individuals should share their ethics and conduct questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an individual’s project leader or Operations Manager is in the best position to address an area of concern. However, if the individual is not comfortable speaking with this person, or is not satisfied with the response received, the individual is encouraged to speak with any officer or Director whom the individual is comfortable in approaching. For suspected fraud, or when they are not satisfied or uncomfortable with following the Organization’s open door policy, individuals should contact the Organization’s Compliance Officer directly.

Part V: Compliance Officer

The Compliance Officer is appointed by the President and approved by the Directors. He or she should not be a current Foundation officer, Director, or Operations Manager. The Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning ethical and conduct violations and, at his or her discretion, shall advise the President and/or Board of Directors. The Compliance Officer has direct access to the finance committee of the Board of Directors.

Part VI: Accounting and Auditing Matters

The finance committee of 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 finance committee of any such complaint and work with the committee until the matter is resolved.

Part VII: Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation of business and personal ethics 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.

Part VIII: Confidentiality

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

Part IX: Handling of Reported Violations

The Compliance Officer will notify the sender and acknowledge receipt of the reported 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.

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Adopted by the CRF Board of Directors on October 4, 2014