

**WHISTLEBLOWER POLICY  
OF  
Pantry Gift, Inc.**

**ARTICLE I  
Purpose**

1. Pantry Gift, Inc. (the “Organization”) requires Directors, Officers, Employees, Members, Volunteers, and others to observe high standards of business and personal ethics in the conduct of their duties and responsibilities.
2. As representatives of the Organization, we must practice honesty and integrity in fulfilling responsibilities and comply with all applicable laws and regulations.
3. Any portion of this Whistleblower Policy found to be in contradiction to the Arkansas Whistle-Blower Act, § 21-1-601 *et seq* or any other relevant controlling law, shall be void, while all other portions remain intact and in effect.

**ARTICLE II  
Reporting Responsibility**

1. This Whistleblower Policy is intended to encourage and enable Officers, Directors, Employees, Members, Volunteers, and others to raise serious concerns internally so that the Organization can address and correct inappropriate conduct and actions.
2. It is the responsibility of all Directors, Officers, Employees, Members, Volunteers, and others to report concerns about violations of the Organization’s Bylaws or suspected violations of Local, State, or Federal laws and/or regulations that govern the Organization’s operations.

**ARTICLE III  
No Retaliation**

1. It is contrary to the values of the Organization for anyone to retaliate against any Director, Officer, Employee, Member, Volunteer or others who in good faith reports an ethics violation, or a suspected violation of law, such as, but not limited to, a complaint of discrimination, suspected fraud, or suspected violation of any regulation governing the operations of the Organization.
2. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including revocation of membership and/or termination from any seat or capacity said person has on the Board of Directors or otherwise within the Organization.

**ARTICLE IV**  
**Reporting Procedure**

1. The Organization has an open-door policy and suggests that Directors, Officers, Employees, Members, Volunteers, and others share their questions, concerns, suggestions or complaints with the Board of Directors.
2. If you are not comfortable speaking with the Board of Directors as whole you may share your questions, concerns, suggestions or complaints with an individual Director on the Board, or to the Compliance Officer.
3. If you are not satisfied with the response you receive upon sharing your questions, concerns, suggestions or complaints, you are encouraged to submit in writing your issue(s) to be considered by the Board of Directors.
4. The Board of Directors is required to address any matters brought to its attention via this Whistleblower Policy at the next regularly scheduled meeting of the Board of Directors.
5. The Board of Directors may, upon their discretion, call a special meeting of the Board of Directors to address any matters brought to their attention via this Whistleblower Policy.

**ARTICLE V**  
**Compliance Officer**

1. The Compliance Officer may be a member of the Board of Directors, an Officer, or a third party designated by the organization to receive, investigate and respond to complaints.
2. The Organization's Compliance Officer is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved.
3. The Compliance Officer will advise the Board of Directors of all complaints and their resolution and will report at least annually to the Treasurer on compliance activity relating to accounting or alleged financial improprieties.

**ARTICLE VI**  
**Accounting and Auditing Matters**

1. The Organization's Compliance Officer shall immediately notify the Board of Directors of any concerns or complaint regarding corporate accounting practices, internal controls, or auditing and work with the Board of Directors until the matter is resolved.

**ARTICLE VII**  
**Acting in Good Faith**

1. 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.
2. 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 including, at the majority vote of the Board of Directors, revocation of membership and/or termination from the seat and/or capacity such person is serving within the Organization.

**ARTICLE VIII**  
**Confidentiality**

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

**ARTICLE IX**  
**Handling of Reported Violations**

1. The Organization's Compliance Officer will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation.
2. All reports will be promptly investigated and addressed at the next regularly scheduled meeting of the Board of Directors, unless the Board of Directors choose to call a special meeting for the specific purpose of addressing the matter brought to it via this Whistleblower Policy, pursuant to Article IV, Section 5.
3. Appropriate corrective action will be taken on behalf of the Board of Directors if warranted by the investigation.