

WHISTLEBLOWER PROTECTION POLICY

This policy is designed to protect employees and address KW's commitment to integrity and ethical behavior.

KW requires directors, officers, employees and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of KW, 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 KW can address and correct inappropriate conduct and actions. It is the responsibility of all board member, officers, employees and volunteers to report concerns about violations of KW's code of ethics or suspected violations of law or regulations that govern KW's operations.

NO RETALIATION

No board member, officer, employee or volunteer who in good faith reports an ethics violation or a suspected violation of law shall suffer harassment, retaliation or adverse employment consequence. 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

KW has an open door policy and suggests that employees share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an employee's supervisor is in the best position to address an area of concern. However, if an employee is not comfortable speaking with his or her supervisor or he or she is not satisfied with the supervisor's response, the employee is encouraged to speak with the President and CEO. Supervisors are required to report suspected ethical and legal violations in writing to KW's designated Compliance Officer who has the responsibility to investigate all reported complaints. For suspected fraud, or when an employee is not satisfied or is uncomfortable with following KW's open door policy, individuals should contact KW's Compliance Officer directly. Contact the KW office manager at 414-771-6848 if further contact information is needed.

COMPLIANCE OFFICER

The Compliance Officer will be the Vice President of Mission Advancement. The Compliance Officer is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Compliance Officer will advise the President and CEO of all complaints and their resolution. The Compliance Officer will report at least annually to the Treasurer on compliance activity relating to accounting or alleged financial improprieties.

The complainant will be notified about what actions will be taken, to the extent reasonably possible and consistent with any privacy or confidentiality limitations. If no further action or investigation is to follow, an explanation for the decision will be given to the complainant.

In the event the Compliance Officer is suspected of having committed a Violation, then the Violation will be reported to the President and CEO.

ACCOUNTING AND AUDITING MATTERS

The Compliance Officer shall immediately notify the Finance Committee of any concerns or complaints 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 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 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.

HANDLING OF REPORTED VIOLATIONS

KW's Compliance Officer 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.