

OAR WHISTLEBLOWER POLICY

INTRODUCTION

Open Apparel Registry (“OAR”) requires its directors, officers, employees, volunteers, and external collaborators/partners to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the OAR, we must practice honesty and integrity in fulfilling our responsibilities and compliance with all applicable laws, regulations, as well as OAR’s Safeguarding Policy.

REPORTING RESPONSIBILITY & VIOLATIONS

This Whistleblower Policy is intended to encourage and enable employees and other stakeholders listed above to raise serious concerns internally so that OAR can address inappropriate conduct and actions. If any concerns fall under the umbrella of the Safeguarding Policy, OAR’s board and management will proceed to follow the steps laid out in that specific policy. It is the responsibility of all board members, officers, employees and volunteers (“Stakeholders”) to report concerns about ethical Violations or suspected violations of law or regulations that govern OAR’s operations (each, a “Violation”) to a source within OAR before turning to outside parties for resolution.

The following are some examples of Violations that should be reported:

- (a) Exploitation, harassment, intimidation, or misconduct of any kind
- (b) Stealing or misappropriation of OAR’s funds, supplies or other assets
- (c) Fraud or deliberate error in the preparation, evaluation, review, or audit of any financial statement or accounting records of OAR
- (d) Deficiencies in or non-compliance with OAR’s internal accounting controls
- (e) Authorizing or receiving compensation for goods not received or services not performed
- (f) Pursuit of a benefit or advantage in violation of OAR’s conflict of interest policy
- (g) Unauthorized alteration or manipulation of OAR’s documents or computer files in violation of OAR’s records management and retention policy

NO RETALIATION

It is contrary to the values of OAR for anyone to retaliate against any board member, officer, employee or volunteer who in good faith reports a violation. 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.

COMPLIANCE OFFICERS

The Operations Manager & COO/CFO (“Compliance Officers”) are responsible for ensuring that all complaints about unethical or illegal Violations are investigated and resolved.

REPORTING PROCESS

OAR has an open-door policy and suggests that employees share their questions, concerns, suggestions or complaints with their manager. Managers are required to report concerns about suspected ethical and legal Violations in writing to OAR’s Compliance Officers, who have the responsibility to investigate all reported Violations. Employees who are not comfortable

speaking with their manager or are not satisfied with their manager's response, are encouraged to speak directly with the Compliance Officers. OAR utilizes the platform AllVoices in order to provide its stakeholders with an anonymous space to raise concerns. Access to the platform is provided during onboarding and can be found on our website [here](#).

ACTING IN GOOD FAITH

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. 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.

HANDLING REPORTED VIOLATIONS

The Compliance Officers will notify the complainant and acknowledge receipt of the reported violation or suspected violation. The Compliance Officers will also inform OAR's board within 5 business days of the opening of any investigations of potential Violations. In addition, a report will be provided to the board showcasing total submitted complaints on a quarterly basis. The Compliance Officers, are responsible for promptly investigating all reported Violations and for causing appropriate corrective action to be taken if warranted by the investigation.

Upon the receipt of the reported violation, the Compliance Officers will collaborate to determine appropriate next steps, and if an investigation is necessary. Next steps may include corresponding with the board, collaborating with external HR expertise, liaising with legal counsel, or reporting the incident to local authorities. The Compliance Officers will manage any subsequent investigation, and may request the assistance of the parties listed, as appropriate.

The Compliance Officers will fully investigate the complaint, meeting separately with the complainant and with others who either are named in the complaint or who may have knowledge of the facts set forth in the complaint. The Compliance Officers will explore anonymous complaints to the extent possible, but will weigh the prudence of continuing such investigations against the likelihood of confirming the alleged facts or circumstances from attributable sources.

Upon completion of the investigation, 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.

ACCOUNTING AND AUDITING MATTERS

OAR's Compliance Officers should utilize the Accounting Procedures Manual and the OFAC Compliance policy as a resource for all accounting matters. If any concerns or regarding corporate accounting practices, internal controls, or auditing, result in an investigation, the Compliance Officers shall notify the OAR Board Chair and Treasurer within 5 business days and work with the individual until the matter is resolved.

CONFIDENTIALITY

Violations or suspected violations may be submitted on a confidential basis 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.