

LIMITLESS COMMUNITY DEVELOPMENT

WHISTLEBLOWER POLICY

Effective July 1, 2026

1. Purpose

Limitless Community Development (LCD) is committed to lawful, ethical, transparent, and accountable conduct. This policy encourages directors, officers, employees, volunteers, contractors, and other persons working with LCD to report in good faith suspected misconduct without fear of retaliation.

2. Matters That Should Be Reported

- Fraud, theft, embezzlement, misuse of funds or assets, or falsification of records.
- Violations of federal, state, or local law, regulation, grant requirements, or LCD policy.
- Improper accounting, internal controls, financial reporting, audit practices, or destruction or alteration of records.
- Conflicts of interest, self-dealing, bribery, kickbacks, or other unethical conduct.
- Harassment, discrimination, retaliation, abuse of authority, or conduct that may endanger clients, staff, volunteers, or the public.
- Any attempt to conceal misconduct or prevent a good-faith report.

3. Reporting Procedure

Concerns should be reported promptly to the CEO, Board Chair, Treasurer, or another member of the Board of Directors who is not implicated in the concern. If the concern involves the CEO, it should be reported directly to the Board Chair. If it involves the Board Chair, it should be reported to the Treasurer or another disinterested Board member. Reports may be made verbally or in writing and should include enough detail to permit a reasonable review. Anonymous reports will be considered to the extent sufficient information is provided.

4. No Retaliation

LCD prohibits retaliation against any person who, in good faith, reports a concern, participates in an investigation, or refuses to participate in conduct reasonably believed to be unlawful or unethical. Retaliation may result in disciplinary action, up to and including termination of employment or service.

5. Good-Faith Reporting

A person making a report must act in good faith and have reasonable grounds for believing the information indicates misconduct. Knowingly making a false or malicious allegation may result in appropriate disciplinary action.

6. Investigation and Confidentiality

LCD will review reports promptly and impartially. The Board may appoint disinterested directors, legal counsel, auditors, or other qualified persons to investigate. Information will be kept confidential to the extent reasonably possible while allowing a thorough investigation and complying with law. Individuals implicated in a report will not control or improperly influence the investigation.

7. Corrective Action and Records

When a concern is substantiated, LCD will take appropriate corrective action and, when required, make appropriate disclosures or reports. Records relating to complaints and investigations will be maintained in accordance with LCD's record-retention requirements and applicable law. No person may knowingly destroy, alter, conceal, or falsify a record to obstruct an investigation, audit, or legal proceeding.

8. Administration

The Board of Directors is responsible for oversight of this policy. The CEO is responsible for day-to-day implementation except when a matter involves the CEO or presents a conflict requiring Board oversight.

9. Acknowledgment

Directors, officers, employees, and other designated representatives may be required to acknowledge receipt of this policy periodically.

Policy Acknowledgment

I acknowledge that I have received and reviewed the Limitless Community Development Whistleblower Policy and agree to comply with its requirements.

Name: _____

Signature: _____ Date: _____