

WHISTLEBLOWER POLICY

Windward requires its directors, employees, and contractors to observe high standards of business and personal ethics when conducting their duties and responsibilities. In accordance with this whistleblower policy, it is the responsibility of all directors, employees, and contractors to report any activities or practices that may be illegal, could result in harm to Windward or its projects, or may be contrary to Windward's policies, including violations related to:

- Accounting controls and procedures
- Child protection
- Confidential or proprietary information
- Conflicts of interest
- Equal employment opportunity
- Fraud
- Harassment
- Legal compliance

NO RETALIATION

No employee or contractor who, in good faith, reports a violation shall suffer harassment, retaliation, or adverse employment consequences. An employee or contractor who retaliates against someone who has reported a violation in good faith is subject to disciplinary action, up to and including termination. This policy is intended to encourage and enable stakeholders to promptly raise serious concerns to Windward.

REPORTING VIOLATIONS

All leaders and directors within Windward encourage employees or contractors to share their questions, concerns, suggestions, or complaints. In most cases, the project director is in the best position to address an area of concern for an employee or contractor. However, if an employee or contractor is not comfortable speaking with the project director or is not satisfied with the project director's response, the employee or contractor is encouraged to speak with the director of human resources, an account manager, or anyone in a management position with whom he/she is comfortable approaching. All managers are required to report suspected violations to Windward's general counsel, who has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or when an employee or contractor is not satisfied or is uncomfortable with following Windward's open door policy, individuals should contact Windward's general counsel directly.

For violations related to harassment or child protection, please also refer to the specific sections of this handbook related to harassment and child protection for additional guidance.

GENERAL COUNSEL

Windward's general counsel, or such other disinterested individual as is appointed by the general counsel, is responsible for investigating and resolving all reported complaints and allegations concerning violations and, at his/her discretion, shall so advise Windward's board of directors. All claims should be directed to generalcounsel@windwardfund.org.

ACCOUNTING AND AUDITING MATTERS

The board of directors shall address all reported concerns or complaints regarding Windward's accounting practices, internal controls or auditing. The general counsel shall immediately notify the president and board of directors of any such complaint and work with the appropriate parties until the matter is resolved.

ACTING IN GOOD FAITH

Anyone who files a complaint concerning a violation or suspected violation must act in good faith, having reasonable grounds for believing the information disclosed indicates a violation.

CONFIDENTIALITY

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously directly to:

General Counsel
1201 Connecticut Avenue, NW
Suite 300
Washington, DC 20036.

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

The general counsel will 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.