

## Integrity and Ethical Behavior Policy

### Policy:

This policy addresses the commitment of Community Shares of Greater Milwaukee to integrity and ethical behavior by helping to foster and maintain an environment where employees can act appropriately, without fear and retaliation. Employees are strongly encouraged to discuss with the executive director, other appropriate personnel, or board president when in doubt about the best and ethical course of action in a particular situation.

### Reports of Wrongdoing

The Company shall not take adverse employment action against an employee in retaliation for:

- any reports of wrongdoing made in good faith; or
- similar authority over the employee, regarding any conduct the employee in good faith believes constitutes a violation of federal law relating to fraud against the Company's shareholders; or
- participating in an investigation, hearing, court proceeding or other administrative inquiry in connection with a report of wrongdoing.

This policy is intended to encourage reporting of wrongdoing by Community Shares employees and presumes that employees will act in good faith and will not make false accusations. An employee who knowingly or recklessly makes statements or disclosures that are not in good faith may be subject to discipline, which may include termination. Employees who report acts of wrongdoing pursuant to this policy can and will continue to be held to the organization's job performance standards. Therefore, an employee against whom legitimate adverse employment actions have been taken or are proposed to be taken for reasons other than prohibited retaliatory actions, such as poor job performance or misconduct by the employee, is prohibited from using this policy as a defense against the organization's lawful actions.

### Definitions

For purpose of this policy:

- 1) Good Faith. Good Faith is evident when the report is made without malice or consideration of personal benefit and the employee has a reasonable basis to believe the report is true; provided, however, a report does not have to be proven to be true to be made in good faith. Good faith is lacking when the disclosure is known to be malicious, false or frivolous.
- 2) Wrongdoing. Examples of wrongdoing include, but not limited to, fraud, including financial fraud and accounting fraud, violation of laws and regulations, violations of organization policies, unethical behavior or practices, endangerment to public health or safety and negligence of duty.
- 3) Adverse Employment Action. Examples of adverse employment action include, but are not limited to, demotion, suspension, termination, transfer to a lesser position, denial of promotions, denial of benefits, threats, harassment, denial of compensation and privileges as a result of the employee's report of wrongdoing, or any manner of discrimination against an employee in the terms and conditions of employment because of any other lawful act done by the employee pursuant to this policy or Section 806 of the Sarbanes-Oxley Act of 2002.

## Reports of Wrongdoing

An employee who becomes aware of any wrongdoing or suspected wrongdoing is encouraged to make a report as soon as possible by contacting the executive director. However, if the suspected wrongdoing involves the executive director, then the report should be made to the board president or vice president. Acts of wrongdoing may be disclosed in writing, by email, by telephone or in person.