



Whistleblower Policy

Let's Do It Foundation (Teeme Ära Sihtasutus)

I Purpose

Let's Do It Foundation encourages active involvement of the members of the Supervisory Board, the members of the Management Board, employees, contractual consultants and volunteers (including advisors, ambassadors, mentors) in the community in furtherance of its mission. In order to deal openly and fairly with reporting fraudulent or dishonest conduct, Let's Do It Foundation adopts the following Whistleblower Policy.

II Policy

The Supervisory and Management Boards are committed to having Let's Do It Foundation comply with high standards with respect to the Code of Ethics of the Estonian Nonprofit Organizations, Standards of Good Accounting, internal controls and standards of auditing. In adopting this policy, the Supervisory and Management Boards recognize that such high standards are supported by a policy that ensures that all Supervisory and Management Board members, employees, contractual consultants and volunteers of the Let's Do It Foundation who wish to report fraudulent or dishonest conduct regarding ethics, accounting, internal controls, or auditing matters shall be free to do so without fear of dismissal or retaliation.

III Procedures

Reporting of Possibly Fraudulent or Dishonest Conduct

- All Supervisory and Management Board members, employees, contractual consultants and volunteers are encouraged to report possible fraudulent or dishonest conduct, that is, to become “whistleblowers.”
- Any employee, contractual consultant or volunteer should report his or her concerns to a direct supervisor or a member of Management Board.
- If for any reason any employee, contractual partner or volunteer finds it difficult to report his or her concern to a direct supervisor, employee, contractual partner and/ or volunteer can report it directly to any member of the Management Board or a any member of the Supervisory Board.
- A supervisor must communicate any allegations of possible fraudulent or dishonest conduct to any member of the Management Board or a any member of the Supervisory Board if they determine that a claim has merit.
- If any employee, contractual partner or volunteer concludes that a member of the Management Board or Supervisory Board is engaged in, or is unwilling to take effective action with respect to, illegal activities or serious failures in Let's Do It Foundation



internal controls, the employee, contractual partner or volunteer should promptly communicate this concern directly to the Chair of the Supervisory Board.

- A supervisor is required to report suspected fraudulent or dishonest conduct to any member of the Management Board.
- Anyone, however, who makes a baseless allegation (that is, an allegation made with reckless disregard for its truth or falsity) to Let's Do It Foundation, may be subject to disciplinary action by and legal claims by individuals accused of such conduct.

Procedures on Treatment of Reports

- Let's Do It Foundation will investigate any possibly fraudulent or dishonest use or misuse of Let's Do It Foundation resources or property by management, employees, contractual consultants or volunteers.
- Anyone found to have engaged in a fraudulent or dishonest conduct is subject to disciplinary action by Let's Do It Foundation up to and including civil or criminal prosecution when warranted.
- Let's Do It Foundation will use best efforts to protect whistleblowers against retaliation and will maintain their identity as confidential unless:
 - (i) the person agrees to be identified;
 - (ii) identification is necessary to allow Let's Do It Foundation or law enforcement officials to investigate or respond effectively to the report;
 - (iii) identification is required by law; or
 - (iv) the person accused of fraud is entitled to the information as a matter of legal right in disciplinary proceedings.
- Let's Do It Foundation employees, contractual partner or volunteers may not retaliate against a whistleblower with the intent or effect of adversely affecting the terms or conditions of employment or service agreement (including but not limited to, threats of physical harm, loss of job, punitive work assignments, or impact on salary, wages or fee). Whistleblowers who believe that they have been retaliated against may file a written complaint with the Supervisory Board. A proven complaint of retaliation shall result in a proper remedy for the person harmed and the initiation of disciplinary action, up to and including dismissal, against the retaliating person. This protection from retaliation is not intended to prohibit supervisors from taking action, including disciplinary action, in the usual scope of their duties and based on valid performance-related factors.

Supervisors Duties

- Supervisors are responsible for maintaining a system of management controls, which detect and deter fraudulent or dishonest conduct.



- When dealing with suspected misconduct, supervisor:
 - (i) should ensure that documents relating to the suspected misconduct are not altered, concealed, or destroyed;
 - (ii) should not contact the person suspected to further investigate the matter or demand restitution;
 - (iii) should not discuss the case with anyone other than the member of the Management Board or a duly authorized law enforcement officer;
 - (iv) should direct all inquiries from any legal representative retained by the suspected individual to the Management Board representative; and
 - (v) should direct all inquiries from the media to the Management Board representative.

Contact

Questions related to the interpretation of this policy should be directed to any member of the Management Board. All questions will be treated confidentially.

IV Entry into force

The Whistleblower policy is confirmed by the Management Board of the Let's Do It Foundation and enters into force at the time of its approval by the Supervisory Board of the Let's Do It Foundation.

The policy has to be signed by the Heads of the Teams of the Let's Do It Foundation and introduced to all of its employees and legal network.