

WHISTLEBLOWER POLICY

The B Team is committed to operating in compliance with all applicable laws, rules and regulations and requires its Directors, Officers, Senior Partners, employees, former employees and independent contractors (“Covered Persons”) to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. The B Team is further committed to encouraging its employees to report, if they have a reasonable belief, any actual or suspected wrongdoing, abuse of power, illegal activity, unethical behavior or violation of The B Team’s policies, any law, rule or regulation, poses a substantial threat to public health or safety or constitutes health care fraud, in connection with The B Team business, operations, governance and events (collectively, “Covered Activities”) without fear or risk of retaliation by following the procedures outlined in this policy.

Reporting

All Covered Persons may report in good faith any Covered Activities involving the conduct of The B Team business. This policy is not a vehicle for reporting violations of the organization’s applicable anti-harassment, anti-discrimination and workplace conduct policies, or other similar problems with co-workers or managers, or for private conduct outside the scope of The B Team business.

No Retaliation Will Be Tolerated

No Covered Persons who in good faith reports any Covered Activities shall suffer intimidation, harassment, discrimination, retaliation, adverse employment consequence or contacting or threatening to contact United States immigration authorities or otherwise reporting or threatening to report a protected individual’s suspected citizenship or immigration status or the suspected citizenship or immigration status of a protected individual’s family or household member. The B Team will not take any similar action against any person who supports, aids, substantiates or otherwise cooperates with any employee who has lodged a report. The B Team will not, with the intent to retaliate, take any action against a Covered Person who refuses to participate in Covered Activities.

In addition, The B Team will not, with the intent to retaliate, take any action harmful to any Covered Person who has provided truthful information to either law enforcement personnel or a court or other public body relating to the possible commission of Covered Activities.

The B Team may take disciplinary action (up to and including termination) against any Covered Person who has engaged in unlawful retaliatory conduct in violation of this policy.

Reporting Procedure

Any Covered Person who identifies any actual or suspected Covered Activities should raise his or her concerns with the line manager of the individual in question. If a Covered Person reasonably feels that the situation has not been sufficiently resolved, the Covered Person may then report his or her concerns to the Chair. However, if: (i) the Covered Person is not comfortable speaking with the Chair, or (ii) the Covered Person is not satisfied by the response from the Chair, or (iii) the concern involves the conduct of the Chair, the Covered Person is encouraged to speak with the Chair of the Audit Committee. Reports of suspected Covered Activities may be submitted to the relevant person in writing or orally.

Covered Persons need only make a “good faith effort” to report the Covered Activity to the employer prior to notifying a public body.

No employer notification is required at all when:

- There is an imminent and serious danger to the public health or safety;
 - The whistleblower reasonably believes that reporting to the supervisor would result in a destruction of evidence or other concealment of the activity, policy, or practice;
 - The activity, policy, or practice could reasonably be expected to lead to endangering the welfare of a minor;
 - The whistleblower reasonably believes that reporting to the supervisor would result in physical harm to the whistleblower or any other person; or
 - The whistleblower reasonably believes that the supervisor is already aware of the activity, policy, or practice and will not correct it.

Any person who makes a complaint of suspected Covered Activities maliciously, in bad faith, or with the knowledge that it is false, shall be subject to discipline, up to and including termination or removal.

Confidentiality

The B Team will endeavor to keep confidential any reports of suspected Covered Activities, as well as the identity of the reporting individual, if requested to do so. However, The B Team’s interest in a thorough and adequate investigation of the allegations means that it cannot promise to maintain absolute confidentiality.

Investigation

All reports submitted in compliance with this policy will be promptly investigated as appropriate. The Audit Committee shall be notified of any concerns or complaints regarding accounting practices, internal controls or auditing, and apprised of or will participate in (as appropriate) the investigation and resolution of any such complaints.

Retaliation Claim

Per an amendment to Section 740 of the NYS Labor Law, Covered Persons have two years to bring a retaliation claim against The B Team, after having made a good faith effort to bring the matter to the employer’s attention.

Policy Distribution

The B Team will ensure that all Covered Persons are advised of the contents of this Whistleblower Policy and understand the procedures available to them as well as the prohibition against retaliation.

Adopted by resolution of The B Team Board of Directors this MONTH DATE, 2023.

I, [Covered Person printed name], acknowledge receipt of and fully understand this Whistleblower Policy.

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Employee’s Signature

Date