



NOBLE Whistleblower Policy

The North of Boston Library Exchange ("NOBLE") requires directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of NOBLE, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that NOBLE can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees and volunteers to report concerns about violations of, or suspected violations of, any rules, standards, laws or regulations that govern NOBLE's operations.

No Retaliation

It is contrary to the values of NOBLE for anyone to retaliate against any board member, officer, employee or volunteer who in good faith reports an ethics violation, a suspected violation of federal or Massachusetts law, a complaint of discrimination of any kind prohibited by federal or Massachusetts law, a suspected breach of fiduciary duty, suspected fraud, or suspected violation of any regulation governing the operation of NOBLE, including but not limited to the rules and requirements of the Massachusetts Attorney General's Non-Profit Organizations/Public Charities Division. Anyone who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

Reporting Procedure

NOBLE's Compliance Officer for purposes of enforcing this policy shall be the Executive Director, who shall promptly investigate all reports. NOBLE has an open-door policy and suggests that employees share their questions, concerns, suggestions or complaints with their supervisor. If you are not comfortable speaking with the Executive Director or your report concerns the Executive Director, you are encouraged to speak with the President of NOBLE, who shall act as Compliance Officer regarding that report. Employees with concerns or complaints may also submit their concerns in writing directly to the Executive Director or to the President.

Compliance Officer

The Compliance Officer is responsible for ensuring that all reports of inappropriate or unlawful conduct covered by this policy are investigated and properly resolved. The Compliance Officer will advise the Executive Board of all complaints and their

resolution and will report at least annually to the Executive Board on compliance activity relating to accounting or alleged financial improprieties.

Accounting and Auditing Matters

The Compliance Officer shall immediately notify the Executive Board of any concerns or complaint regarding corporate accounting practices, internal controls or auditing and work with the Board until the matter is resolved.

Acting in Good Faith

Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove both not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation and to comply with any requirements of law pertaining to the investigation.

Handling of Reported Violations

The Compliance Officer will notify the person who submitted the complaint and will acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

Approved at the Annual Meeting, June 4, 2020.

Reaffirmed by NOBLE Executive Board, May 7, 2025