

WHISTLEBLOWER POLICY

TrekFreely

A Colorado Nonprofit Corporation

Adopted by the Board of Directors on 6/21/2026

1. PURPOSE

TrekFreely (the “Corporation”) is committed to operating with integrity and accountability. This Policy encourages directors, officers, the Executive Director, employees, volunteers, contractors, and donors to report suspected violations of law, ethics, or Corporation policy in good faith, and protects them from retaliation when they do.

2. SCOPE

This Policy applies to anyone who in good faith reports a reasonable concern about TrekFreely’s conduct or operations. Covered concerns include, but are not limited to:

- Violations of federal, state, or local law
- Financial misconduct, including theft, fraud, embezzlement, or misuse of corporate funds
- Inaccurate or misleading financial reporting
- Violations of TrekFreely’s governing documents, Conflict of Interest Policy, Document Retention and Destruction Policy, Gift Acceptance Policy, Accounting Policy, or other adopted policies
- Misuse of user data, including unauthorized access, disclosure, or commercialization
- Endangerment of users, partners, or emergency responders, including knowingly publishing unsafe or harmful information
- Harassment, discrimination, or abuse of any director, officer, employee, volunteer, contractor, or beneficiary
- Retaliation against a person who has made a good-faith report under this Policy

3. REPORTING PROCEDURE

3.1 Primary Channel. Concerns should be reported to the Board Chair in writing, by email, or by any other reasonable means. Reports should describe the conduct of concern, the persons involved, and any supporting information available to the Reporting Person.

3.2 Alternate Channel. If the concern involves the Board Chair, or if the Reporting Person

reasonably believes the Board Chair cannot impartially address the concern, the report may instead be directed to the Treasurer or to any other director not named in the report.

3.3 Anonymous Reports. TrekFreely will accept and investigate anonymous reports to the extent practicable. Anonymous reports may be harder to investigate, and the Reporting Person is encouraged but not required to identify themselves.

4. NON-RETALIATION

4.1 Prohibition. No director, officer, the Executive Director, employee, volunteer, or contractor shall be subject to retaliation, harassment, demotion, dismissal, discipline, threats, or any other adverse action because they, in good faith, reported a concern under this Policy, participated in an investigation, or refused to participate in conduct they reasonably believed to be unlawful or in violation of this Policy.

4.2 Reporting Retaliation. Retaliation is itself a reportable violation under this Policy and shall be addressed using the same procedures.

4.3 Enforcement. Any person found to have retaliated against a Reporting Person shall be subject to corrective action, up to and including removal from the Board, termination of appointment as Executive Director, termination of employment, or termination of contract.

5. CONFIDENTIALITY

Reports shall be treated as confidential to the maximum extent consistent with thorough investigation and the rights of any person accused. Confidentiality may be limited where disclosure is required by law, by court order, or by the legitimate needs of the investigation. The Reporting Person will be notified of any such limit where practicable.

6. INVESTIGATION

6.1 Acknowledgment. The recipient of a report shall acknowledge receipt to the Reporting Person, where identifying information is available, within a reasonable time.

6.2 Conduct. Reports shall be investigated promptly and impartially. The Board Chair (or alternate recipient under Section 3.2) may conduct the investigation, delegate it to a disinterested director or committee, or engage outside counsel or investigators as appropriate.

6.3 Recusal. Any director who is the subject of a report, or whose impartiality could reasonably be questioned, shall recuse themselves from the investigation and from any related Board deliberation or vote. The Executive Director shall recuse where the Executive Director is the subject of, or has a personal interest in, the report.

6.4 Resolution. Upon conclusion of the investigation, the Board shall determine what corrective action, if any, is appropriate. The Reporting Person shall be notified of the resolution where

practicable and consistent with confidentiality.

7. BAD-FAITH REPORTS

This Policy protects good-faith reporting. Knowingly false reports, or reports made with reckless disregard for the truth, are not protected and may themselves be subject to corrective action. Honest mistakes do not constitute bad faith.

8. RECORDS

Records of reports made under this Policy, investigations conducted, and resolutions reached shall be maintained in accordance with the Document Retention and Destruction Policy, with appropriate confidentiality safeguards.

9. POLICY ADMINISTRATOR AND ANNUAL REVIEW

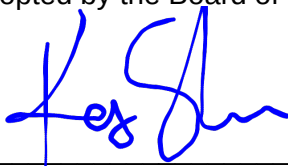
The Board Chair shall serve as Policy Administrator and shall ensure that this Policy is communicated to directors, officers, the Executive Director, employees, volunteers, and contractors. The Board shall review this Policy at least annually.

10. AMENDMENT

This Policy may be amended by a majority vote of the Board at any regular or special meeting.

CERTIFICATION

Adopted by the Board of Directors of TrekFreely on 6/21/2026.



Kerry Taylor, Secretary