



RISE & RALLY'S WHISTLEBLOWER POLICY

WHISTLEBLOWER POLICY - REPORTING OF MISCONDUCT AND COMPLIANCE CONCERNS:

Rise & Rally Organization is dedicated to upholding the highest standards of integrity, transparency, and ethical conduct in all aspects of its operations. This Whistleblower Policy is designed to encourage the reporting of any unlawful, unethical, or improper conduct related to the organization's governance, finances, and compliance with applicable laws and regulations.

Reporting Concerns:

- Rise & Rally Organization encourages all employees who have a reasonable belief or suspicion of misconduct to report their concerns promptly and in good faith. Misconduct may include, but is not limited to, financial fraud, theft, misrepresentation of financial information, improper use of assets, violations of organizational policies or procedures, and any other unlawful or unethical behavior.
- Employees are encouraged to report their concerns to their supervisor, the Chief Executive Officer, or the Vice President of Human Resources. If an employee believes that these channels of communication are inadequate, inaccessible, or wishes to remain anonymous, they may report their concerns directly to the Chair of the Audit Committee or utilize external reporting channels, such as regulatory agencies or legal authorities.

Protection Against Retaliation:

- Rise & Rally Organization prohibits retaliation against employees who report misconduct in good faith. Employees will not be subjected to disciplinary action, demotion, termination, or any other adverse employment action for raising concerns or making reports under this policy. Retaliation against whistleblowers is strictly prohibited and will result in disciplinary action, up to and including termination of employment.
- Retaliation includes but is not limited to harassment, intimidation, threats, discrimination, or adverse actions taken against an employee because they have reported misconduct or participated in an investigation. Rise & Rally Organization is committed to ensuring the confidentiality and anonymity of whistleblowers to the extent possible, and any attempts to identify or retaliate against whistleblowers will be treated as serious violations of this policy.



Investigation and Resolution:

- Reports of misconduct will be promptly and thoroughly investigated by the Chair of the Audit Committee or their designee. All reports will be handled with confidentiality, sensitivity, and impartiality. Whistleblowers will be kept informed of the progress and outcome of the investigation to the extent possible, while respecting the privacy and rights of all parties involved.
- Rise & Rally Organization will take appropriate action based on the findings of the investigation, which may include corrective measures, disciplinary action, restitution, or referral to law enforcement authorities if necessary. The organization is committed to addressing and remedying any identified misconduct promptly and effectively to uphold the organization's integrity and reputation.

Communication and Awareness:

- This Whistleblower Policy, along with contact information for the Chair of the Audit Committee and external reporting channels, will be prominently displayed on the organization's intranet and communicated to all employees during their onboarding process. Regular training sessions and awareness campaigns will be conducted to ensure that employees understand their rights and obligations under this policy and feel empowered to raise concerns without fear of reprisal.
- Rise & Rally Organization is committed to fostering a culture of transparency, accountability, and ethical behavior. By encouraging the reporting of misconduct and promptly addressing concerns, we uphold our commitment to integrity and the best interests of our organization and the communities we serve.

Regular Review and Updates:

- Rise & Rally Organization recognizes the importance of regularly reviewing and updating the Whistleblower Policy to ensure its continued effectiveness and alignment with best practices and legal requirements. The policy will be subject to periodic review by the Board of Directors or its designated committee, with input from relevant stakeholders, including employees, legal counsel, and external advisors. Any necessary updates or revisions to the policy will be made in a timely manner and communicated to all employees to ensure their continued awareness and understanding of their rights and obligations under the policy.

Anonymous Reporting:

- Rise & Rally Organization acknowledges that some employees may prefer to report misconduct anonymously due to concerns about retaliation or fear of repercussions. Therefore, anonymous reports of misconduct will be accepted and investigated to the fullest extent possible. While anonymous reporting may limit the organization's ability to fully investigate certain allegations or provide feedback to the whistleblower, every effort will be made to protect the anonymity of the whistleblower and ensure that their concerns are addressed in a fair and impartial manner.



Confidential Handling of Reports:

- Rise & Rally Organization is committed to handling all reports of misconduct with the utmost confidentiality and discretion. Information obtained during the course of an investigation will be disclosed only to those individuals who have a legitimate need to know in order to conduct the investigation or take appropriate action. Whistleblowers and individuals involved in the investigation will be reminded of their obligation to maintain confidentiality throughout the process to protect the integrity of the investigation and the privacy rights of all parties involved.

Training and Awareness:

- Rise & Rally Organization will provide regular training and awareness programs to all employees to ensure they understand their rights and obligations under the Whistleblower Policy. Training will include information on how to recognize and report misconduct, the organization's non-retaliation policy, the process for handling whistleblower reports, and the importance of maintaining confidentiality throughout the process. New employees will receive training on the Whistleblower Policy as part of their orientation, and refresher training will be provided periodically to ensure ongoing compliance and awareness.

By implementing these additional components, Rise & Rally Organization aims to further strengthen its Whistleblower Policy and ensure that employees feel empowered to report misconduct without fear of retaliation and with confidence that their concerns will be taken seriously and addressed promptly and effectively.

Making a Report:

Rise & Rally Organization encourages any employee who has a concern regarding an action of the organization's governance, finances, or compliance with all applicable laws and regulations to raise the concern with their supervisor, the Chief Executive Officer, or the Vice President of Human Resources.

If an employee does not believe these channels of communication are adequate or wishes to remain anonymous, the concern can be reported via mail. Employees should mark the envelope: "TO BE OPENED BY ADDRESSEE ONLY. PERSONAL AND CONFIDENTIAL."

Anonymous reports will be accepted, and all reports will be handled on a confidential basis to protect the identity of the whistleblower. The contact information for the Chair of the Audit Committee will be prominently displayed on the organization's intranet and communicated to all employees through the personnel manual and orientation materials. Additionally, Human Resources will be responsible for updating the contact information for the Chair of the Audit Committee after new elections and ensuring that the policy with the updated contact information is distributed to all staff.



CONTACT INFORMATION TO MAKE A REPORT:

Haley James Bowers
3020 Bernal Ave Ste 110 PMB 3019
Pleasanton, CA 94566
925-264-9019