



**WHISTLEBLOWER POLICY
OF
FOOD TANK: THE THINK TANK FOR FOOD**
Adoption Date: May 1, 2026

BACKGROUND

Food Tank: The Think Tank for Food (referred to herein as “Food Tank,” or the “Organization”) is a nonprofit organization incorporated in Illinois and recognized as exempt from federal income taxes under section 501(c)(3) of the Internal Revenue Code of 1986, as amended (the “Code”), and is classified as a publicly supported charity as described in section 170(b)(1)(A)(vi) of the Code.

ARTICLE I

PURPOSE

The purpose of this Whistleblower Policy (the “Policy”) is to encourage Personnel, as defined below, and other individuals associated with Food Tank to report in good faith credible information regarding illegal practices, violations of adopted policies, or other improper conduct, and to establish a clear and consistent process for the receipt, investigation, and resolution of such reports.

This Policy is intended to promote a culture of transparency, accountability, and ethical conduct by providing a mechanism through which concerns may be raised and addressed internally, and by identifying the appropriate individuals or bodies to whom such concerns may be reported. This Policy further provides that individuals who report concerns in good faith shall be protected from retaliation, harassment, or adverse action as a result of such reporting. This Policy is designed to supplement, and not replace, any applicable state and federal laws governing whistleblower protections and organizational compliance.

ARTICLE II

STATEMENT OF CORE PRINCIPLES

Food Tank is committed to maintaining the highest standards of integrity, ethics, accountability, and transparency in all aspects of its operations and activities. All Personnel, as defined below, and other individuals associated with the Organization are expected to act in good faith, exercise sound judgment, and comply with applicable laws, regulations, and Organizational policies.

To support these commitments, the Organization encourages the reporting of credible concerns regarding illegal, unethical, or improper conduct and is committed to addressing such concerns, as appropriate, promptly, thoroughly, and in a fair and impartial manner. The Organization strictly prohibits retaliation against any individual who, in good faith, reports a concern, refuses to participate in unlawful conduct, or participates in an investigation under this Policy.

ARTICLE III

TERMS AND DEFINITIONS

Whistleblowing: Under the Illinois Whistleblower Act (740 ILCS 174) (referred to herein as the “IWA,” or “740 ILCS 174”), whistleblowing refers to the disclosure, or threatened disclosure, by Personnel or other individual to a supervisor, member of the Board of Directors, or other appropriate recipient, of information relating to an activity, policy, or practice of the Organization that the individual reasonably and in good faith believes (i) violates applicable federal, state, or local law, rule, or regulation, or (ii) poses a substantial and specific danger to employees, public health, or safety.

Retaliatory action: Under 740 ILCS 174, retaliatory action includes any adverse action, including but not limited to adverse employment action or the threat of such action, taken by the Organization or its agents to penalize or deter an individual from engaging in protected whistleblowing activity. Retaliatory Action includes conduct that would dissuade a reasonable person from making a report, including interference with employment or future employment opportunities, but excludes actions taken in good faith, in compliance with applicable law, or based on legitimate performance-related considerations.

Personnel: All individuals associated with Food Tank, including directors, officers, employees, independent contractors, volunteers, and any other persons who perform services for, represent, or act on behalf of the Organization, whether on a full-time, part-time, temporary, or unpaid basis.

ARTICLE IV

REPORTING

1. Reporting Responsibility

All Personnel are encouraged to report, in good faith, any known or suspected illegal, unethical, or improper conduct, or any violation of applicable law or Organizational policy. Such concerns may include, without limitation, fraud, theft, misuse of Organizational assets, accounting or auditing irregularities, improper financial practices, data security or confidentiality breaches, harassment or discrimination, unsafe working conditions, or violations of the Organization's policies, including the Conflict of Interest Policy. Personnel are not expected to investigate or resolve suspected misconduct prior to making a report. The responsibility of Personnel is to report concerns promptly and in good faith so that the Organization may assess and address the matter appropriately.

2. Reporting Procedures

Personnel are encouraged to report concerns under this Policy through the reporting channels with which they are most comfortable. The Organization maintains an open-door approach and encourages Personnel to raise concerns with their immediate supervisor. If a reporting individual is not comfortable doing so, or believes the concern has not been appropriately addressed, the concern may be reported to the President or Executive Director of the Organization. If the concern involves the Executive Director, it should be reported directly to the Chairman of the Board. If the concern involves the Chairman, it may be reported to any other disinterested member of the Board.

Personnel are encouraged, but not required, to identify themselves when making a report in order to facilitate review and follow-up. Reports may be made anonymously to the extent permitted by law. The Organization will review all reports received under this Policy and may take such steps as it deems appropriate under the circumstances, including conducting an investigation, consulting with advisors, and taking corrective or remedial action. The Organization may, where appropriate, provide follow-up communication to the reporting individual.

ARTICLE V

CONFIDENTIALITY AND COOPERATION

The Organization shall treat all reports made under this Policy as confidential to the extent reasonably possible, consistent with the need to conduct an appropriate review, investigate the matter, obtain legal or other professional advice, take corrective action, and comply with applicable law. Individuals making a report under this Policy are expected to act in good faith, cooperate fully with any review or investigation conducted by the Organization, and provide complete and truthful information in connection with such review or with any governmental, regulatory, or law enforcement inquiry.

ARTICLE VI

NO RETALIATION

The Organization strictly prohibits Retaliatory Action, as defined in this Policy, against any Personnel who engages in protected activity in good faith. Protected activity includes the disclosure or threatened disclosure of information relating to an activity, policy, or practice of the Organization that the individual reasonably believes (i) violates applicable federal, state, or local law, rule, or regulation, or (ii) poses a substantial and specific danger to employees,

public health, or safety. Such disclosures may be made internally to supervisors, officers, or members of the Board of Directors, or externally to governmental or law enforcement authorities, or in connection with any investigation, hearing, or proceeding.

The Organization also prohibits Retaliatory Action against any Personnel who refuses to participate in an activity that the individual reasonably and in good faith believes would result in a violation of applicable law. In addition, the Organization prohibits any threat of Retaliatory Action against Personnel for engaging in protected activity or for refusing to participate in unlawful conduct.

Any individual who engages in Retaliatory Action, or who threatens such action, shall be subject to appropriate disciplinary and corrective measures. This provision is intended to be interpreted and applied consistently with applicable whistleblower protection laws, including the Illinois Whistleblower Act.

In addition to the prohibitions set forth above, any act or omission by the Organization or its agents, whether within or outside the workplace, that would be materially adverse to a reasonable person and is taken because an individual has disclosed or attempted to disclose wrongdoing, including public corruption, shall constitute prohibited Retaliatory Action under this Policy.

ARTICLE VII

ACTING IN GOOD FAITH

All reports made under this Policy must be made in good faith and based on a reasonable belief that the information disclosed indicates a violation of law, ethical standards, or Organizational policy. Reports that are unsubstantiated after investigation will not, by themselves, result in adverse action against the reporting individual, provided the report was made in good faith. However, any report made with malicious intent, in bad faith, or with knowledge that the information is false shall constitute a violation of this Policy and may result in appropriate disciplinary and corrective action.

ARTICLE VIII

NO PROHIBITED POLICIES

For the avoidance of doubt, nothing in this Policy is intended to prohibit or restrict any Personnel from disclosing information to a governmental or law enforcement agency where the individual has reasonable cause to believe that such information discloses a violation of applicable federal, state, or local law, rule, or regulation. This Policy shall be interpreted and applied in accordance with 740 ILCS 174/10.

ARTICLE IX

PENALTIES

Violations of applicable whistleblower protection laws, including the Illinois Whistleblower Act, may subject the Organization and responsible individuals to criminal and civil liability. Such violations may constitute a Class A misdemeanor under Illinois law and may give rise to civil actions by affected individuals seeking relief, including injunctive relief, reinstatement, back pay with interest, front pay, liquidated damages, and recovery of attorneys' fees and other costs. The Organization is committed to preventing such violations through compliance with this Policy and applicable law.

ARTICLE X

GOVERNING LAW

This Whistleblower Policy shall be governed by and interpreted in accordance with the laws of the state of Illinois.