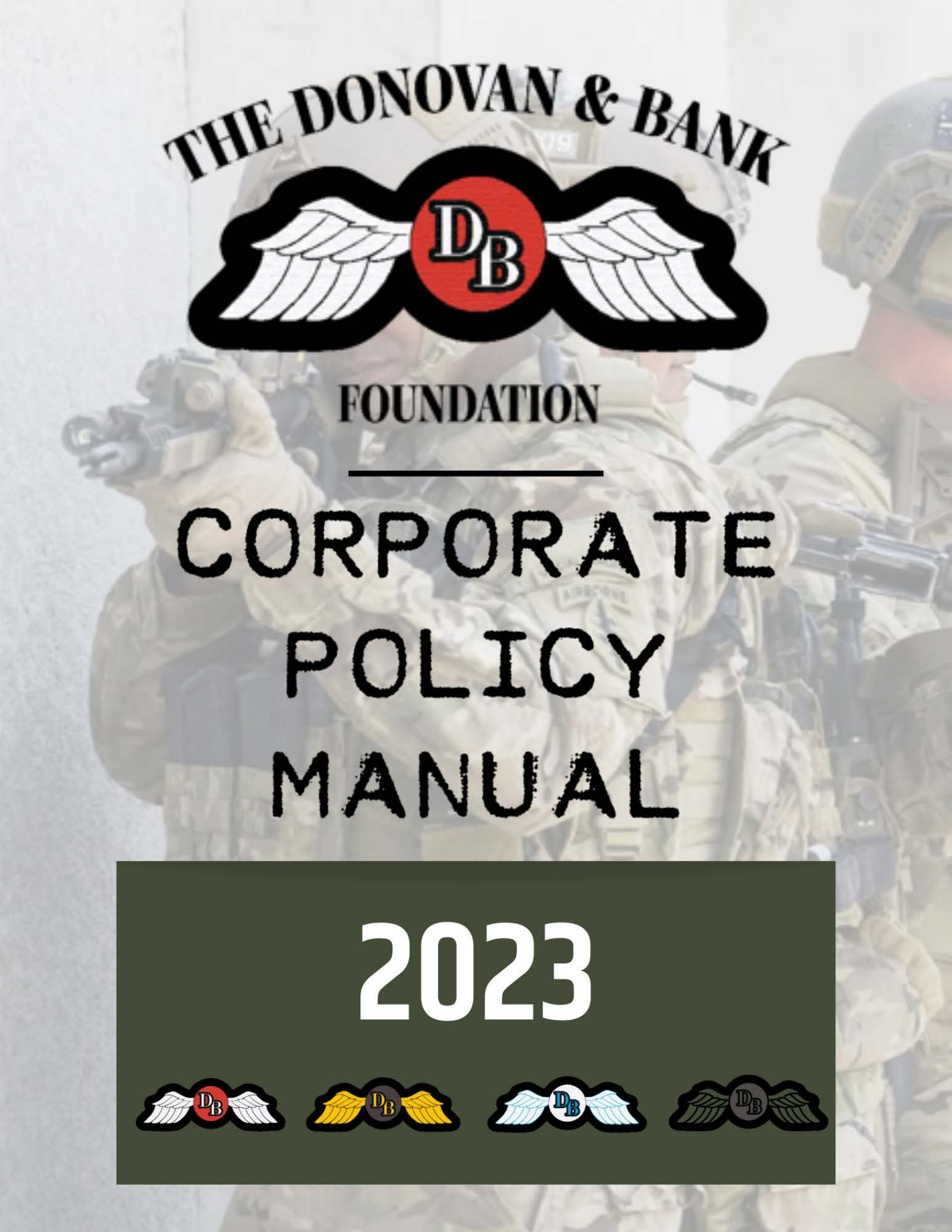


THE DONOVAN & BANK

FOUNDATION

CORPORATE POLICY MANUAL

2023

The policies and procedures outlined in this manual are intended to provide clear, consistent, and transparent guidance for all employees, board members, and volunteers of the Donovan & Bank Foundation (the "Foundation"). These policies are designed to ensure that the Foundation operates in an ethical, legal, and effective manner while maintaining a positive and productive work environment.

The Foundation expects all employees, board members, and volunteers to understand and adhere to these policies. The policies are subject to periodic review and updates to reflect changes in laws, regulations, and organizational needs. The Foundation reserves the right to modify, amend, or withdraw any of these policies at its discretion.

This manual is a reference guide and does not constitute a contract of employment or a guarantee of any specific terms or conditions of employment. It is intended to clarify expectations and provide guidance on key operational procedures. While the policies are intended to promote fairness, consistency, and effective decision-making, the Foundation reserves the right to exercise discretion in applying them as appropriate based on the situation.

By adhering to these policies, we ensure that the Foundation’s mission to help Special Operators bring closure to their warrior story and transition to a life of peace, contentment and balance. support Special Operators is carried out with integrity, professionalism, and a commitment to excellence.

TABLE OF CONTENTS

Policy 001: Conflict of Interest Policy

Policy 002: Whistleblower Protection

Policy 003: Document Retention & Destruction Policy

Policy 004: Anti-Discrimination Policy

Policy 005: Fundraising Policy

Policy 006: Compensation and Benefits Policy

Policy 007: Volunteer Policy

Policy 008: Code of Conduct and Ethics Policy

Policy 009: Dress Code Policy

Policy 010: Privacy and Confidentiality Policy

Policy 011: Health and Safety Policy

Policy 012: Social Media Policy

Policy 013: Grievance Policy

Policy 014: Nonprofit Investment Policy

Policy 015: Risk Management Policy

Policy 016: Travel Policy

Ratification & Board Approval

Policy 001: Conflict of Interest
Donovan & Bank Foundation
Effective Date: 2 March 2023

001-1. **Purpose**

001-1.1 The Donovan & Bank Foundation ("the Foundation") is committed to maintaining the highest standards of integrity and transparency in its operations.

001-1.2 This policy is intended to protect the Foundation's interests by ensuring that board members, officers, employees, and key volunteers disclose any potential or actual conflicts of interest and take appropriate steps to mitigate them.

001-2. **Definition of Conflict of Interest**

001-2.1 A conflict of interest arises when a person in a position of authority within the Foundation has a financial, personal, or professional interest that could interfere with their duty to act in the best interest of the Foundation.

001-2.2 Conflicts of interest may include, but are not limited to:

001-2.2.1 Engaging in business transactions with the Foundation (directly or through family members).

001-2.2.2 Receiving personal benefits or compensation from vendors, donors, or partners.

001-2.2.3 Holding a financial interest in an entity that does business with the Foundation.

001-2.2.4 Using the Foundation's resources, name, or influence for personal gain.

001-2.2.5 Participating in decision-making where personal interests may impair objectivity.

001-3. **Disclosure of Conflicts**

001-3.1 All board members, officers, employees, and key volunteers must disclose potential conflicts of interest as soon as they arise.

001-3.2 Disclosure should be made in writing to the Board Chair or Executive Director.

001-3.3 Annual Disclosure Statement

001-3.3.1 Each board member and officer must complete a Conflict of Interest Disclosure Form annually, affirming their understanding of this policy and disclosing any potential conflicts.

001-4. **Procedures for Addressing Conflicts**

001-4.1 If a conflict of interest is identified:

001-4.1.1 Recusal – The individual must recuse themselves from any discussions or decisions related to the conflict.

001-4.1.2 Review by the Board – The Board of Directors (or a designated committee) will evaluate the conflict and determine an appropriate course of action.

001-4.1.3 Documentation – The board's decision and any remedial action will be documented in meeting minutes.

001-5. **Violations of Policy**

001-5.1 Failure to disclose a conflict or comply with this policy may result in disciplinary action, including removal from the board, termination of employment, or other appropriate measures.

001-6. **Periodic Review**

001-6.1 This policy shall be reviewed annually by the Board of Directors to ensure its continued effectiveness.

001-7. **Policy Ratification**

001-7.1 This policy was ratified by a vote of the full Board of Directors of the Donovan & Bank Foundation on March 2nd, 2023.

PAUL J TOOLAN

EXECUTIVE DIRECTOR

NOTARIZED:

Policy 001: Conflict of Interest

Signature of Notary Public: _____

Printed Name of Notary: Kristian Z. Adams

Commission Number: _____

Commission Expires: 11/6/2029

State of: North Carolina

County of: New Hanover

KRISTIAN Z ADAMS
COMMISSION EXPIRES
NOTARY
PUBLIC
11/6/2029
NEW HANOVER COUNTY, N.C.

Policy 002: Whistleblower Protection
Donovan & Bank Foundation
Effective Date: 2 March 2023

002-1. **Purpose**
002-1.1 The Donovan & Bank Foundation ("the Foundation") is committed to maintaining a workplace culture that promotes ethical behavior, accountability, and transparency.
002-1.2 This policy is designed to encourage and protect individuals who report suspected misconduct, violations of law, or unethical behavior within the Foundation.
002-1.3 The Foundation prohibits retaliation against any individual who, in good faith, reports a concern or participates in an investigation.

002-2. **Scope**
002-2.1 This policy applies to all employees, board members, volunteers, contractors, and other individuals associated with the Foundation.
002-2.2 It covers reports of suspected illegal activity, financial impropriety, gross mismanagement, abuse of authority, or other unethical conduct.

002-3. **Reporting Process**
002-3.1 Any individual who becomes aware of misconduct or unethical behavior should report their concerns promptly.
002-3.2 Reports may be submitted through the following channels:
002-3.2.1 Directly to the Executive Director or Board Chair.
002-3.2.2 Through a designated third-party reporting system, if applicable.
002-3.2.3 In writing, via email, or anonymously through an established confidential reporting mechanism.
002-3.3 Reports should include as much detail as possible, including dates, locations, individuals involved, and any supporting evidence.

002-4. **Investigation of Reports**
002-4.1 The Foundation will treat all reports seriously and conduct a thorough, impartial investigation.
002-4.2 Investigations will be overseen by the Executive Director, Board Chair, or an independent investigator if necessary.
002-4.3 The individual reporting the concern will be kept informed of the status of the investigation, within the limits of confidentiality requirements.

002-5. **Protection Against Retaliation**
002-5.1 Retaliation against individuals who report misconduct in good faith is strictly prohibited.
002-5.2 Retaliation includes, but is not limited to, termination, demotion, harassment, or any other form of adverse action.

002-5.3 Any individual found to have engaged in retaliation will be subject to disciplinary action, up to and including termination.

002-6. **Confidentiality**
002-6.1 The Foundation will protect the confidentiality of whistleblowers to the extent possible, consistent with the need to conduct a thorough investigation.
002-6.2 Information related to a whistleblower report will only be shared on a need-to-know basis.

002-7. **False Reports**
002-7.1 Reports made in bad faith or with malicious intent may result in disciplinary action.
002-7.2 The Foundation encourages good-faith reporting and will not tolerate false accusations intended to harm others.

002-8. **Periodic Review**
002-8.1 This policy shall be reviewed annually by the Board of Directors to ensure its continued effectiveness and compliance with applicable laws and best practices.

002-9. **Policy Ratification**

002-9.1 This policy was ratified by a vote of the full Board of Directors of the Donovan & Bank Foundation on March 2nd, 2023.

PAUL J TOOLAN

EXECUTIVE DIRECTOR

NOTARIZED:

Policy 002: Whistleblower Protection

Signature of Notary Public: _____

Printed Name of Notary: Kristian Z. Adams

Commission Number: _____

Commission Expires: 11/6/2029

State of: North Carolina

County of: New Hanover

KRISTIAN Z ADAMS
COMMISSION EXPIRES
NOTARY
PUBLIC
11/6/2029
NEW HANOVER COUNTY, N.C.

Policy 003: Document Retention & Destruction
Donovan & Bank Foundation
Effective Date: 2 March 2023

003-1. **Purpose**

003-1.1 The Donovan & Bank Foundation ("the Foundation") is committed to effective record management practices that ensure compliance with legal, regulatory, and operational requirements.

003-1.2 This policy establishes guidelines for the retention, storage, and destruction of Foundation documents and records.

003-1.3 Proper document retention and destruction practices help protect confidential information, reduce storage costs, and ensure transparency.

003-2. **Scope**

003-2.1 This policy applies to all physical and electronic records created, received, or maintained by the Foundation.

003-2.2 It covers all employees, board members, volunteers, and contractors handling Foundation records.

003-2.3 This policy aligns with applicable federal and state laws governing document retention and destruction.

003-3. **Retention Schedule**

003-3.1 The Foundation will retain records according to the following general schedule:

003-3.1.1 Financial records (e.g., audits, tax returns, financial statements) – Minimum of 7 years.

003-3.1.2 Governance documents (e.g., bylaws, board meeting minutes, policies) – Permanent.

003-3.1.3 Employee and payroll records – Minimum of 7 years after termination.

003-3.1.4 Grant records – Minimum of 7 years after grant closure.

003-3.1.5 Contracts and agreements – Minimum of 7 years after expiration.

003-3.1.6 Donor records – Minimum of 7 years.

003-3.1.7 General correspondence and administrative records – Minimum of 3 years.

003-3.2 The Board of Directors may approve exceptions to the retention schedule as needed.

003-4. **Storage and Security**

003-4.1 All records must be stored securely to prevent unauthorized access, loss, or damage.

003-4.2 Electronic records must be backed up regularly and protected against cybersecurity threats.

003-4.3 Sensitive or confidential records must be restricted to authorized personnel only.

003-5. **Destruction of Records**

003-5.1 Records that have met their retention period and are no longer required must be destroyed securely.

003-5.2 Physical records must be shredded, incinerated, or otherwise destroyed in a manner

that prevents reconstruction.
003-5.3 Electronic records must be permanently deleted from all storage systems, including backups.
003-5.4 Records subject to litigation, audits, or investigations must not be destroyed until the matter is resolved.

003-6. **Litigation Hold**
003-6.1 In the event of legal action, investigation, or audit, the Foundation will implement a litigation hold.
003-6.2 Affected records must not be altered, deleted, or destroyed until legal counsel authorizes resumption of normal retention practices.

003-7. **Policy Compliance**
003-7.1 Employees, board members, and volunteers are responsible for complying with this policy.
003-7.2 Violations of this policy may result in disciplinary action, including termination.

003-8. **Periodic Review**
003-8.1 This policy shall be reviewed annually by the Board of Directors to ensure compliance with legal requirements and best practices.

003-9. Policy Ratification

003-9.1 This policy was ratified by a vote of the full Board of Directors of the Donovan & Bank Foundation on March 2nd, 2023.

PAUL J TOOLAN

EXECUTIVE DIRECTOR

NOTARIZED:

Policy 003: Document Retention & Destruction

Signature of Notary Public: _____

Printed Name of Notary: Kristian Z Adams

Commission Number: _____

KRISTIAN Z ADAMS
COMMISSION EXPIRES
NOTARY
PUBLIC
11/6/2029
NEW HANOVER COUNTY, N.C.

Policy 004: Anti-Discrimination Policy
Donovan & Bank Foundation
Effective Date: 2 March 2023

004-1. Purpose

004-1.1 The Donovan & Bank Foundation ("the Foundation") is committed to treating all individuals fairly and with respect.

004-1.2 This policy ensures that no one within the Foundation is discriminated against because of their race, color, religion, gender, gender identity, sexual orientation, age, national origin, disability, or any other characteristic protected by law.

004-1.3 The Foundation is dedicated to maintaining a workplace and environment free from discrimination.

004-2. Scope

004-2.1 This policy applies to all employees, board members, volunteers, and contractors of the Foundation.

004-2.2 This policy covers all activities within the Foundation, including hiring, training, promotion, benefits, and program participation.

004-2.3 It also applies to interactions with clients, donors, partners, and other external stakeholders.

004-3. Policy Details

004-3.1 Discrimination based on any protected characteristic, including race, gender, religion, or disability, will not be tolerated.

004-3.2 The Foundation will provide reasonable accommodations for individuals with disabilities to ensure they have the same access to programs and services.

004-3.3 All decisions, such as hiring and promotion, will be made based on qualifications and merit, not on personal characteristics.

004-3.4 Harassment or inappropriate behavior related to someone's characteristics will not be tolerated.

004-4. Responsibilities

004-4.1 Employees, board members, and volunteers are expected to treat others with fairness and respect.

004-4.2 Supervisors and managers are responsible for enforcing this policy and addressing any concerns promptly.

004-4.3 All individuals are encouraged to report any incidents of discrimination or harassment to the appropriate Foundation personnel.

004-5. Enforcement

004-5.1 Violations of this policy will be taken seriously and dealt with promptly.

004-5.2 Those found in violation of this policy may face disciplinary actions, including counseling, suspension, or termination.

004-5.3 The Foundation will take action to correct discriminatory practices and ensure that all individuals are treated fairly.

004-6. Periodic Review

004-6.1 This policy will be reviewed regularly to ensure it is in compliance with legal requirements and is being followed properly.

004-6.2 The policy will be updated if necessary to address any new issues related to discrimination.

004-7. Policy Ratification

004-7.1 This policy was ratified by a vote of the full Board of Directors of the Donovan & Bank Foundation on March 2nd, 2023.

PAUL J TOOLAN

EXECUTIVE DIRECTOR

NOTARIZED:

Policy 004: Anti-Discrimination Policy

Signature of Notary Public: _____

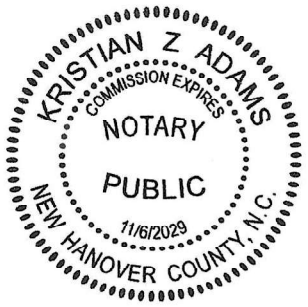
Printed Name of Notary: Kristian Z Adams

Commission Number: _____

Commission Expires: 11/6/2029

State of: North Carolina

County of: New Hanover



Policy 005: Fundraising Policy
Donovan & Bank Foundation
Effective Date: 2 March 2023

005-1. Purpose

005-1.1 The Donovan & Bank Foundation ("the Foundation") is committed to raising funds in a manner that is transparent, ethical, and compliant with all applicable laws and regulations.
005-1.2 This policy outlines the principles and procedures for fundraising to ensure the Foundation's activities are in alignment with its mission and values.
005-1.3 The Foundation will conduct all fundraising activities in a manner that respects the dignity of donors and beneficiaries and ensures proper stewardship of all funds.

005-2. Scope

005-2.1 This policy applies to all fundraising activities conducted by or on behalf of the Foundation, including events, campaigns, online fundraising, grants, and individual donations.
005-2.2 This policy applies to all employees, board members, volunteers, and third-party organizations engaged in fundraising for the Foundation.

005-3. Fundraising Practices

005-3.1 All fundraising efforts must be transparent and fully disclose how funds will be used, ensuring that donor intent is respected.
005-3.2 The Foundation will not engage in deceptive or misleading practices in its fundraising efforts.
005-3.3 The Foundation will comply with all local, state, and federal laws and regulations governing fundraising and charitable solicitations.
005-3.4 The Foundation will maintain proper records of all fundraising activities and financial transactions to ensure accountability and transparency.

005-4. Donor Relations

005-4.1 The Foundation will treat all donors with respect and gratitude, ensuring they are informed about how their contributions are being used.
005-4.2 Donors will be given the option to remain anonymous, and their privacy will be respected at all times.
005-4.3 The Foundation will provide donors with receipts for tax purposes in accordance with applicable laws.

005-5. Restrictions on Fundraising

005-5.1 The Foundation will not accept donations that are conditional upon actions that would conflict with the Foundation's mission, values, or ethical standards.
005-5.2 The Foundation will not engage in or solicit donations from individuals or organizations involved in illegal or unethical activities.
005-5.3 The Foundation will not accept donations that could be perceived as a conflict of interest or that would improperly influence the Foundation's operations.

005-6. Reporting and Accountability

005-6.1 The Foundation will provide annual reports to its donors and stakeholders on the use of funds raised.

005-6.2 The Foundation will provide accurate and timely financial information in its public reports, including how funds raised are allocated to the Foundation's programs and activities.

005-6.3 The Foundation will regularly review its fundraising activities to ensure they align with its mission and compliance with this policy.

005-7. Enforcement

005-7.1 Employees, board members, and volunteers are responsible for ensuring that all fundraising activities are conducted in accordance with this policy.

005-7.2 Violations of this policy may result in disciplinary action, including termination of employment, volunteer status, or removal from the board.

005-7.3 Any conflicts, concerns, or violations should be reported to the Foundation's management or board for review.

005-8. Periodic Review

005-8.1 This policy will be reviewed annually by the Board of Directors to ensure its effectiveness and compliance with legal and regulatory requirements.

005-8.2 The policy will be updated as needed to address changes in fundraising practices or regulations.

005-9. Policy Ratification

005-9.1 This policy was ratified by a vote of the full Board of Directors of the Donovan & Bank Foundation on March 2nd, 2023.

PAUL J TOOLAN

EXECUTIVE DIRECTOR

NOTARIZED:

Policy 005: Fundraising Policy

Signature of Notary Public: _____

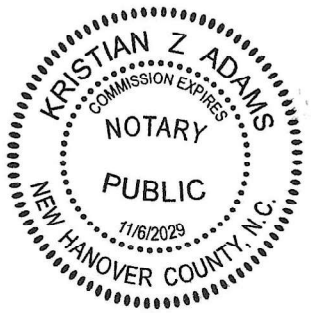
Printed Name of Notary: Kristen Z. Adams

Commission Number: _____

Commission Expires: 11/6/2029

State of: North Carolina

County of: New Hanover



Policy 006: Compensation and Benefits Policy
Donovan & Bank Foundation
Effective Date: 2 March 2023

006-1. Purpose
006-1.1 The Donovan & Bank Foundation ("the Foundation") is committed to providing fair and competitive compensation to its employees, who are retired service members.
006-1.2 This policy outlines the guidelines for compensation administration, ensuring consistency and fairness, while recognizing that employees have existing benefits, such as pensions and health care.
006-1.3 The Foundation aims to attract and retain talented retired service members by offering competitive salaries and fostering a positive work environment.

006-2. Scope
006-2.1 This policy applies to all full-time, part-time, and temporary employees of the Foundation, who are all retired service members.
006-2.2 This policy does not apply to independent contractors or volunteers.
006-2.3 Employees who are not retired service members may be afforded additional benefits, such as health insurance, based on the employee's needs and negotiated during the hiring process.

006-3. Compensation Structure
006-3.1 The Foundation will provide salaries and wages that are competitive with the industry and in line with the financial capabilities of the Foundation.
006-3.2 Compensation is designed to be as level and equal as possible across all positions, with no position within the Foundation being more than 10% higher or lower than any other position.
006-3.3 Compensation will be determined based on job responsibilities, experience, qualifications, and market conditions.
006-3.4 The Foundation will conduct periodic salary reviews to ensure that compensation remains competitive and equitable.

006-4. Benefits Package
006-4.1 The Foundation recognizes that employees, as retired service members, already receive pensions and health care benefits.
006-4.2 As such, the Foundation does not offer additional health care or pension benefits to retired service members, as employees' existing benefits cover these needs.
006-4.3 Employees who are not retired service members may be offered additional benefits, such as health insurance or other relevant benefits, based on the employee's needs and negotiated during the hiring process.

006-5. Paid Time Off (PTO)
006-5.1 Employees are allowed unlimited PTO based on their judgment and individual needs.

006-5.2 Employees are encouraged to use their PTO in a way that ensures a healthy work-life balance while fulfilling their responsibilities at the Foundation.
006-5.3 There is no formal PTO accrual system; employees are trusted to manage their time off responsibly and with consideration to the Foundation's needs.

006-6. End-of-Year Bonuses
006-6.1 End-of-year bonuses will be determined based on the Foundation's fundraising goals and whether or not those goals are met in a given year.
006-6.2 Bonuses will be allocated based on the level of success in achieving fundraising targets, as determined by the Board of Directors.

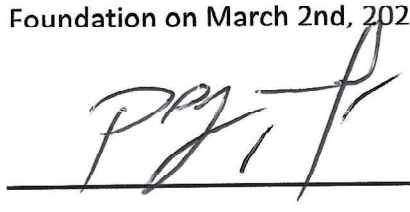
006-7. Salary Increases and Promotions
006-7.1 The Foundation will review employee performance and may provide salary increases or promotions based on job performance, accomplishments, and financial conditions.
006-7.2 Salary increases are subject to the availability of funds and the Foundation's financial standing.
006-7.3 Promotions will be based on employee performance, qualifications, and organizational needs.

006-8. Enforcement
006-8.1 Supervisors and managers are responsible for ensuring that compensation decisions are consistent with this policy.
006-8.2 Any issues or concerns regarding compensation should be reported to the HR department for review.
006-8.3 Violations of this policy may result in corrective action, including disciplinary measures.

006-9. Periodic Review
006-9.1 This policy will be reviewed annually by the Board of Directors to ensure it meets the needs of employees and aligns with the financial status of the Foundation.
006-9.2 The policy may be updated as necessary to reflect changes in laws, regulations, or organizational priorities.

006-9. Policy Ratification

006-9.1 This policy was ratified by a vote of the full Board of Directors of the Donovan & Bank Foundation on March 2nd, 2023.



PAUL J TOOLAN

EXECUTIVE DIRECTOR

NOTARIZED:

Policy 006: Compensation and Benefits Policy

Signature of Notary Public: _____

Printed Name of Notary: Kristian Z. Adams

Commission Number: _____

Commission Expires: 11/6/2029

State of: North Carolina

County of: New Hanover

KRISTIAN Z ADAMS
COMMISSION EXPIRES
NOTARY
PUBLIC
11/6/2029
NEW HANOVER COUNTY, N.C.

Policy 007: Volunteer Policy
Donovan & Bank Foundation
Effective Date: 2 March 2023

007-1. Purpose

007-1.1 The Donovan & Bank Foundation ("the Foundation") values the contributions of volunteers who assist with its mission and support its programs and events.

007-1.2 This policy sets forth the guidelines for volunteer participation, ensuring that all volunteers understand their roles, expectations, and the Foundation's commitment to providing a positive and respectful experience.

007-2. Scope

007-2.1 This policy applies to all individuals volunteering for the Foundation, whether for short-term or long-term assignments, and includes both formal and informal volunteers.

007-2.2 This policy is relevant to volunteers participating in any Foundation event, program, or activity.

007-3. Volunteer Selection and Recruitment

007-3.1 Volunteers will be recruited based on the Foundation's needs and the skills required for specific tasks or events.

007-3.2 Volunteers must complete a volunteer application and, if applicable, a background check before being assigned to any activities.

007-3.3 Volunteers must adhere to the Foundation's standards for conduct and follow all relevant policies and procedures.

007-4. Volunteer Roles and Expectations

007-4.1 Volunteers are expected to commit to their assigned roles and follow instructions provided by Foundation staff or event coordinators.

007-4.2 Volunteers must act in a manner that reflects the values and mission of the Foundation.

007-4.3 Volunteers must comply with any health, safety, or security protocols as required by the Foundation or event-specific guidelines.

007-4.4 Volunteers should notify the appropriate staff if they are unable to fulfill their assigned duties or need to adjust their schedule.

007-5. Volunteer Benefits and Recognition

007-5.1 While the Foundation does not provide financial compensation for volunteer work, it will offer non-monetary benefits, such as experience, training opportunities, and recognition for contributions.

007-5.2 Volunteers will be recognized for their service through appreciation events, certificates, or other forms of acknowledgment.

007-5.3 Volunteers may be eligible for certain Foundation events, programs, or merchandise as a token of gratitude.

007-6. Volunteer Termination

007-6.1 Volunteers who fail to meet the expectations set forth in this policy or who violate Foundation rules and standards may be removed from volunteer roles.

007-6.2 Volunteers may also voluntarily terminate their involvement at any time by notifying the appropriate Foundation staff.

007-7. Confidentiality and Confidential Information

007-7.1 Volunteers must respect the confidentiality of sensitive information encountered during their service.

007-7.2 Volunteers must not disclose, distribute, or use confidential information for personal gain or outside the scope of their volunteer duties.

007-8. Liability and Insurance

007-8.1 The Foundation maintains insurance that covers volunteers while they are participating in Foundation-related activities.

007-8.2 Volunteers are expected to act in a responsible manner and are encouraged to consult Foundation staff or supervisors for guidance on safety and risk management.

007-9. Periodic Review

007-9.1 This policy will be reviewed annually by the Board of Directors to ensure it aligns with the needs of the Foundation and complies with any changes in relevant laws or regulations.

007-9.2 This policy may be updated as necessary to reflect the evolving needs of the Foundation and its volunteer program.

007-10. Policy Ratification

007-10.1 This policy was ratified by a vote of the full Board of Directors of the Donovan & Bank Foundation on March 2nd, 2023.

PAUL J TOOLAN

EXECUTIVE DIRECTOR

NOTARIZED:

Policy 007: Volunteer Policy

Signature of Notary Public:

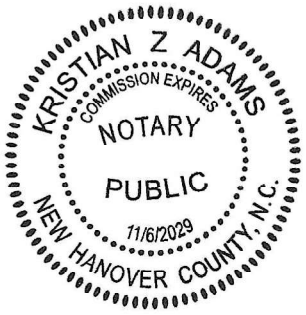
Printed Name of Notary: Kristin Z. Adams

Commission Number: _____

Commission Expires: 11/6/2029

State of: North Carolina

County of: New Hanover



Policy 008: Code of Conduct and Ethics Policy
Donovan & Bank Foundation
Effective Date: 2 March 2023

008-1. Purpose
008-1.1 The Donovan & Bank Foundation ("the Foundation") is committed to maintaining the highest standards of integrity, professionalism, and ethical behavior in all its operations.
008-1.2 This policy provides a framework for expected conduct for all employees, volunteers, board members, and any individuals representing the Foundation.
008-1.3 By adhering to this Code of Conduct, the Foundation ensures a culture of respect, responsibility, and transparency in achieving its mission.

008-2. Scope
008-2.1 This policy applies to all individuals associated with the Foundation, including employees, volunteers, board members, and contractors, who are expected to adhere to the standards outlined in this document.
008-2.2 This policy governs all activities of the Foundation, including but not limited to meetings, events, fundraising efforts, and interactions with external partners, stakeholders, and the public.

008-3. General Principles
008-3.1 All individuals representing the Foundation must act with integrity and honesty in all professional interactions.
008-3.2 Individuals must avoid conflicts of interest and disclose any personal interests that may interfere with their duties or the Foundation's mission.
008-3.3 Discrimination, harassment, or any form of inappropriate behavior will not be tolerated under any circumstances.
008-3.4 All individuals must respect the confidentiality of sensitive or private information related to the Foundation, its donors, beneficiaries, or partners.
008-3.5 Individuals must comply with all applicable laws, regulations, and Foundation policies in the conduct of their activities.

008-4. Ethical Conduct and Conflict of Interest
008-4.1 Employees, volunteers, and board members must disclose any potential or actual conflicts of interest that may affect their ability to act in the best interest of the Foundation.
008-4.2 Individuals must not use their position within the Foundation for personal or financial gain.
008-4.3 Decisions made within the Foundation should be based on what is in the best interest of the Foundation, its mission, and its stakeholders, rather than personal interests.

008-5. Professional Behavior
008-5.1 Individuals representing the Foundation are expected to exhibit professionalism and respect for others in all communications and interactions.

008-5.2 Individuals should foster an environment of collaboration, teamwork, and constructive feedback.
008-5.3 All interactions with the Foundation's stakeholders, donors, partners, and the public must be conducted in a manner that upholds the Foundation's reputation.

008-6. Reporting Violations
008-6.1 Individuals are encouraged to report any violations of this Code of Conduct or ethical concerns to the Foundation's leadership.
008-6.2 The Foundation will provide a confidential and safe process for reporting violations or concerns without fear of retaliation.
008-6.3 All reports of misconduct will be taken seriously and investigated appropriately.

008-7. Enforcement and Disciplinary Action
008-7.1 Violations of this policy may result in corrective actions, including counseling, suspension, or termination, depending on the severity of the breach.
008-7.2 Individuals found to have violated this policy may be subject to disciplinary measures up to and including removal from the Foundation, in accordance with applicable procedures.

008-8. Periodic Review
008-8.1 This policy will be reviewed annually by the Board of Directors to ensure it is up-to-date with best practices and legal requirements.
008-8.2 The policy may be revised or updated as necessary to maintain the highest ethical standards within the Foundation.

008-9. Policy Ratification

008-9.1 This policy was ratified by a vote of the full Board of Directors of the Donovan & Bank Foundation on March 2nd, 2023.

PAUL J TOOLAN

EXECUTIVE DIRECTOR

NOTARIZED:

Policy 008: Code of Conduct and Ethics Policy

Signature of Notary Public: _____

Printed Name of Notary: _____

Commission Number: _____

Commission Expires: 11/6/2029

State of: North Carolina

County of: New Hanover



Policy 009: Dress Code
Donovan & Bank Foundation
Effective Date: 2 March 2023

009-1. Purpose
009-1.1 The Donovan & Bank Foundation ("the Foundation") believes that results and performance should always be prioritized over formal attire.
009-1.2 This policy outlines the Foundation's relaxed approach to dress, with the exception of specific expectations for employees representing the Foundation in public settings.

009-2. Scope
009-2.1 This policy applies to all employees of the Foundation and governs their attire during regular work activities and public-facing events.

009-3. Dress Code Expectations
009-3.1 Employees are free to dress in a manner that is comfortable and practical for their day-to-day work, as long as it does not impede their performance or disrupt the work environment.
009-3.2 While the Foundation encourages a casual and flexible dress code, employees representing the Foundation in any capacity—such as at events, workshops, meetings, or other public-facing activities—are required to wear Donovan & Bank branded apparel.
009-3.3 Branded apparel will always be provided at Foundation expense to ensure employees have the necessary attire for public-facing activities.
009-3.4 The Foundation strongly discourages formal attire such as suits and ties, as it contradicts the Foundation's working-class ethos and brand. Employees should embrace a practical and approachable style that reflects the Foundation's values and culture.
009-3.5 The Foundation reserves the right to establish guidelines for attire based on specific events or circumstances as needed.

009-4. Enforcement
009-4.1 Employees who fail to adhere to the dress code when representing the Foundation will be reminded of the policy and may be asked to adjust their attire as necessary.
009-4.2 This policy is intended to maintain a balance of professionalism while fostering a comfortable work environment.

009-5. Periodic Review
009-5.1 This policy will be reviewed annually by the Board of Directors to ensure it aligns with the Foundation's needs and culture.

009-6. Policy Ratification

009-6.1 This policy was ratified by a vote of the full Board of Directors of the Donovan & Bank Foundation on March 2nd, 2023.

PAUL J TOOLAN

EXECUTIVE DIRECTOR

NOTARIZED:

Policy 009: Dress Code

Signature of Notary Public: _____

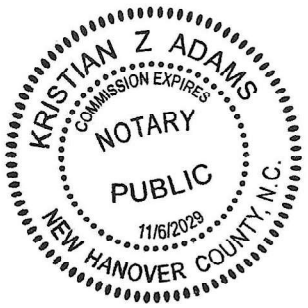
Printed Name of Notary: Kristian Z. Adams

Commission Number: _____

Commission Expires: 11/6/2029

State of: North Carolina

County of: New Hanover



Policy 010: Privacy and Confidentiality Policy
Donovan & Bank Foundation
Effective Date: 2 March 2023

010-1. Purpose
010-1.1 The Donovan & Bank Foundation ("the Foundation") is committed to maintaining the privacy and confidentiality of all personal, financial, and organizational information.
010-1.2 This policy establishes guidelines for the protection of sensitive information to ensure that it is handled responsibly, in compliance with legal and regulatory standards, and in line with the Foundation's commitment to trust and integrity.

010-2. Scope
010-2.1 This policy applies to all employees, board members, volunteers, contractors, and any individuals who have access to the Foundation's sensitive information.
010-2.2 It governs the collection, use, storage, and sharing of personal, financial, and organizational data, both physical and electronic.

010-3. Confidential Information
010-3.1 Confidential information includes, but is not limited to:
010-3.1.1 Personal information of employees, donors, and beneficiaries.
010-3.1.2 Financial data, including tax returns, audits, and fundraising records.
010-3.1.3 Internal Foundation strategies, plans, and operations.
010-3.1.4 Donor records and giving history.
010-3.1.5 Any information that is disclosed to the Foundation with the expectation that it will be kept confidential.
010-3.2 All confidential information should be clearly marked or identified as confidential when necessary.

010-4. Use and Disclosure of Confidential Information
010-4.1 Confidential information must only be used for legitimate Foundation purposes and should not be shared with unauthorized individuals or entities.
010-4.2 Confidential information should only be disclosed when required by law or with explicit consent from the individual or entity to whom the information pertains.
010-4.3 Employees, board members, and volunteers must not discuss or share confidential information outside of the Foundation, except when required for work-related duties.

010-5. Data Security
010-5.1 The Foundation will implement and maintain appropriate measures to protect all sensitive information from unauthorized access, disclosure, or destruction.
010-5.2 Electronic data must be stored securely with encryption and regular backups.
010-5.3 Paper records containing confidential information should be stored in locked and secure locations.

010-5.4 Employees and contractors are required to adhere to the Foundation's data security practices and report any breaches immediately.

010-6. Retention and Disposal of Confidential Information

010-6.1 Confidential information should only be retained for as long as necessary to fulfill its purpose or comply with legal requirements.

010-6.2 Once confidential information is no longer required, it must be securely destroyed. Paper records must be shredded or incinerated, and electronic records must be permanently deleted.

010-7. Confidentiality Agreements

010-7.1 All employees, board members, volunteers, and contractors will sign confidentiality agreements upon engagement with the Foundation.

010-7.2 These agreements outline the responsibilities of individuals to maintain the privacy and confidentiality of sensitive information.

010-8. Policy Compliance

010-8.1 Employees, board members, volunteers, and contractors are responsible for complying with this policy.

010-8.2 Violations of this policy may result in disciplinary action, including termination, legal action, and penalties where applicable.

010-9. Periodic Review

010-9.1 This policy will be reviewed annually by the Board of Directors to ensure its effectiveness and compliance with applicable laws and best practices.

010-10. Policy Ratification

010-10.1 This policy was ratified by a vote of the full Board of Directors of the Donovan & Bank Foundation on March 2nd, 2023.

PAUL J TOOLAN

EXECUTIVE DIRECTOR

NOTARIZED:

Policy 009: Dress Code

Signature of Notary Public:

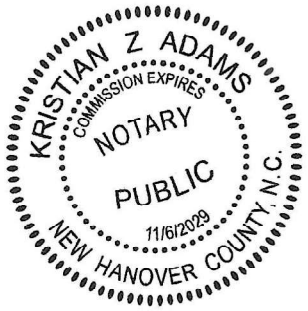
Printed Name of Notary: Kristian Z. Adams

Commission Number: _____

Commission Expires: 11/6/2029

State of: North Carolina

County of: New Hanover



Policy 011: Health and Safety Policy
Donovan & Bank Foundation
Effective Date: 2 March 2023

011-1. Purpose

011-1.1 The Donovan & Bank Foundation ("the Foundation") is committed to ensuring the health, safety, and well-being of all employees, volunteers, and visitors.
011-1.2 This policy outlines the Foundation's commitment to maintaining a safe working environment and provides guidelines to minimize risks and prevent accidents or injuries, particularly in light of the Foundation's involvement in high-risk activities associated with Special Forces training and operations.
011-1.3 The Foundation's health and safety standards will exceed industry norms, as our programs involve activities that require heightened vigilance and more stringent safety protocols.

011-2. Scope

011-2.1 This policy applies to all employees, volunteers, contractors, and visitors associated with the Foundation, including during events, workshops, meetings, and other Foundation activities.
011-2.2 It encompasses both the physical workplace and any off-site activities where employees and volunteers are representing the Foundation, with particular focus on high-risk training and operational activities.

011-3. Health and Safety Responsibilities

011-3.1 The Foundation's management team is responsible for ensuring that the workplace is free from recognized hazards that could cause harm to health or safety, particularly in the context of high-risk training and operational activities.
011-3.2 Employees and volunteers must comply with all health and safety procedures and report unsafe conditions, accidents, or near-misses to their supervisors.
011-3.3 Each individual has the responsibility to maintain a safe working environment, including taking appropriate actions to protect their own health and safety and that of others, especially in more dangerous training environments.

011-4. Workplace Safety Standards

011-4.1 The Foundation will adhere to all applicable local, state, and federal health and safety regulations.
011-4.2 Given the high-risk nature of many of the Foundation's activities, safety practices will exceed standard industry requirements to ensure maximum protection.
011-4.3 Proper training will be provided to all employees and volunteers on safe work practices, including the safe handling of materials, equipment, and the use of personal protective equipment (PPE) when necessary.
011-4.4 Emergency procedures, including evacuation plans and first-aid protocols, will be made

available to all employees and volunteers. Additionally, specialized emergency procedures for high-risk activities will be established.

011-5. Reporting and Investigating Accidents

011-5.1 All accidents, injuries, and near-misses must be reported immediately to the relevant supervisor.

011-5.2 A thorough investigation of any accident or incident will be conducted to identify its causes and to implement corrective actions to prevent future occurrences, with particular attention paid to high-risk activities.

011-5.3 Employees and volunteers are expected to cooperate fully with any investigations into accidents or safety violations.

011-6. Health and Wellness Support

011-6.1 The Foundation will promote health and wellness programs to support the physical and mental well-being of employees and volunteers, particularly to help them cope with the physical demands of high-risk activities.

011-6.2 Employees and volunteers are encouraged to maintain their health, including participating in wellness programs provided by the Foundation when available.

011-6.3 The Foundation will make reasonable accommodations for employees or volunteers who may require adjustments to their work environment for health-related reasons.

011-7. Safety During Events and Off-Site Activities

011-7.1 The Foundation will ensure that all health and safety measures are in place during off-site events, workshops, and other activities, especially those involving high-risk training.

011-7.2 Health and safety protocols, including medical emergency procedures, will be communicated to all participants, and risk assessments will be conducted prior to any event.

011-7.3 When required, the Foundation will provide safety equipment or arrange for safety personnel to be present during events.

011-8. Policy Compliance

011-8.1 Employees, volunteers, and contractors are responsible for complying with this policy and following all health and safety guidelines set by the Foundation.

011-8.2 Failure to adhere to health and safety practices may result in corrective action, including retraining, reassignment, or disciplinary action, up to and including termination.

011-9. Periodic Review

011-9.1 This policy will be reviewed annually by the Board of Directors to ensure its effectiveness and compliance with evolving health and safety laws, regulations, and best practices, particularly in light of the unique risks associated with Special Forces training and operations.

011-10. Policy Ratification

011-10.1 This policy was ratified by a vote of the full Board of Directors of the Donovan & Bank Foundation on March 2nd, 2023.

PAUL J TOOLAN

EXECUTIVE DIRECTOR

NOTARIZED:

Policy 011: Health and Safety Policy

Signature of Notary Public: _____

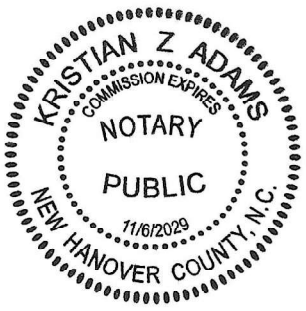
Printed Name of Notary: Kristian Z. Adams

Commission Number: _____

Commission Expires: 11/6/2029

State of: North Carolina

County of: New Hanover



Policy 012: Social Media Policy
Donovan & Bank Foundation
Effective Date: 2 March 2023

012-1. Purpose

012-1.1 The Donovan & Bank Foundation ("the Foundation") recognizes the impact and prevalence of social media in modern communication. However, we believe that social media's value and impact are often overstated, and it does not align with our approach to fostering meaningful connections and partnerships.

012-1.2 This policy establishes the Foundation's approach to social media usage, emphasizing our commitment to authenticity, direct communication, and relationship-building, which are core to our mission.

012-1.3 The Foundation's social media presence, where used, will reflect our belief in personal interaction and substantive engagement with our stakeholders, particularly Special Operators.

012-2. Scope

012-2.1 This policy applies to all employees, board members, volunteers, and contractors representing the Foundation.

012-2.2 It governs the use of social media platforms for Foundation-related communications and outreach, whether official or personal, when it relates to the Foundation's brand, activities, or mission.

012-3. Social Media Usage Guidelines

012-3.1 The Foundation does not rely heavily on social media as a primary means of communication or outreach. Instead, we prioritize personal interactions and direct communication.

012-3.2 Employees and volunteers should exercise discretion when using social media for Foundation-related matters, ensuring that all posts, comments, or engagement are aligned with our values of authenticity, integrity, and respect for the individuals we serve.

012-3.3 When using social media, employees and volunteers should refrain from engaging in public discussions or debates that could reflect negatively on the Foundation, its mission, or its partners.

012-3.4 The Foundation's official social media accounts will be managed by designated personnel, who will ensure content reflects the organization's values and commitment to authenticity and meaningful engagement.

012-4. Representation of the Foundation

012-4.1 Employees and volunteers should be mindful that any social media engagement related to the Foundation could be perceived as representing the Foundation itself. Therefore, they must conduct themselves professionally, respecting the Foundation's mission and ethos.

012-4.2 Posts, photos, or comments that contradict the Foundation's working-class ethos, commitment to Special Operators, or core values should be avoided.

012-4.3 Employees and volunteers must not disclose any confidential or proprietary information related to the Foundation on personal or public social media accounts.

012-5. Limited Social Media Engagement

012-5.1 The Foundation does not engage in extensive social media marketing or outreach campaigns. Instead, we focus on direct relationship-building efforts and personal engagement with stakeholders.

012-5.2 Social media, when used, will be a secondary tool to support our mission rather than a primary channel for communication. It will be used sparingly and with purpose, to complement our direct outreach efforts.

012-5.3 We will not engage in the pursuit of "likes," "shares," or other metrics that are common in social media culture. The Foundation's focus remains on meaningful, substantive interactions.

012-6. Social Media Content

012-6.1 Content shared on official Foundation social media platforms will be consistent with the Foundation's mission and values. Content will focus on real-world impact, highlighting the work and stories of Special Operators and those served by the Foundation.

012-6.2 The Foundation will not participate in trend-driven content or sensationalized topics that may distract from the authenticity and purpose of our work.

012-6.3 Content that promotes political agendas, personal opinions, or non-mission-related issues will be avoided in favor of messaging that aligns with the Foundation's values of service, respect, and authenticity.

012-7. Compliance and Accountability

012-7.1 Employees, volunteers, and contractors are expected to follow this policy and understand that violations may result in corrective actions.

012-7.2 Content shared on social media platforms must comply with the Foundation's privacy, confidentiality, and intellectual property policies.

012-7.3 The Foundation reserves the right to remove or request the removal of any social media content that does not align with our mission or this policy.

012-8. Periodic Review

012-8.1 This policy will be reviewed annually to ensure that it remains aligned with the Foundation's values, goals, and evolving practices in communication and outreach.

012-9. Policy Ratification

012-9.1 This policy was ratified by a vote of the full Board of Directors of the Donovan & Bank Foundation on March 2nd, 2023.

PAUL J TOOLAN

EXECUTIVE DIRECTOR

NOTARIZED:

Policy 012: Social Media Policy

Signature of Notary Public: _____

Printed Name of Notary: Kristian Z. Adams

Commission Number: _____

Commission Expires: 11/6/2029

State of: North Carolina

County of: New Hanover

KRISTIAN Z ADAMS
COMMISSION EXPIRES
NOTARY
PUBLIC
11/6/2029
NEW HANOVER COUNTY, N.C.

Policy 013: Grievance Policy
Donovan & Bank Foundation
Effective Date: 2 March 2023

013-1. Purpose

013-1.1 The Donovan & Bank Foundation ("the Foundation") recognizes that grievances may arise in the course of our work and interaction with employees, volunteers, and stakeholders. This policy establishes the Foundation's approach to addressing grievances in a fair, professional, and direct manner.

013-1.2 The Foundation is committed to resolving grievances quickly and efficiently, with an emphasis on handling issues at the lowest possible level, through direct, face-to-face communication.

013-1.3 Our approach is rooted in the values of integrity, professionalism, and respect, with a clear expectation that all grievances will be addressed directly and without unnecessary escalation.

013-1.4 The Foundation recognizes that, in some cases, alternative resolution methods may be desired. As such, the option for resolution through Brazilian Jiu-Jitsu or other combat sports may be considered as a form of adjudication, with both parties in agreement.

013-2. Scope

013-2.1 This policy applies to all employees, volunteers, and stakeholders of the Foundation, including board members and contractors.

013-2.2 It addresses any complaints, concerns, or issues related to the Foundation's operations, treatment of individuals, or other matters that require resolution.

013-3. Grievance Handling Procedure

013-3.1 **Step 1: Direct Communication**

013-3.1.1 Foundation members are expected to handle grievances at the lowest level possible, typically through a direct, professional, and face-to-face conversation.

013-3.1.2 The individual raising the grievance should first approach the person involved, in a calm and respectful manner, to discuss the issue and seek resolution.

013-3.1.3 The goal is to resolve the grievance at this level, fostering open communication and mutual respect.

013-3.2 **Step 2: Supervisor or Lead Involvement**

013-3.2.1 If the issue cannot be resolved directly between the parties involved, the grievance should be escalated to the immediate supervisor or lead.

013-3.2.2 The supervisor or lead will assess the situation, facilitate a discussion between the parties, and work towards a fair resolution.

013-3.2.3 All efforts will be made to resolve the grievance professionally and swiftly, avoiding unnecessary delays or escalation.

013-3.3 **Step 3: Leadership Involvement**
013-3.3.1 If the grievance remains unresolved at the supervisor or lead level, it may be escalated to senior leadership.
013-3.3.2 Senior leadership will review the grievance, seek additional input if necessary, and make a final determination.
013-3.3.3 Any decision made at this level will be communicated clearly to all involved parties, along with any steps or actions to be taken to address the grievance.

013-3.4 **Step 4: Alternative Resolution Method (Combat Sports)**
013-3.4.1 If both parties agree, the Foundation will offer an alternative resolution method through Brazilian Jiu-Jitsu or another recognized combat sport.
013-3.4.2 The match will be governed by the standard tournament rules of the sport's governing body and conducted in a controlled and safe environment.
013-3.4.3 Both parties must voluntarily agree to this form of dispute resolution, and their agreement must be documented.
013-3.4.4 The outcome of the match will serve as a final and binding resolution for the grievance.

013-4. Confidentiality and Professionalism
013-4.1 All grievances will be handled with confidentiality and respect for the individuals involved.
013-4.2 Employees, volunteers, and contractors are expected to maintain professionalism and discretion throughout the grievance process, ensuring that sensitive information is not disclosed unnecessarily.
013-4.3 The Foundation will make every effort to protect all parties from retaliation or negative consequences as a result of filing or participating in a grievance process.

013-5. Resolution and Outcome
013-5.1 The Foundation aims to resolve grievances fairly, swiftly, and in a manner that respects the interests of all involved parties.
013-5.2 Once a grievance has been resolved, all parties will be informed of the outcome, along with any corrective actions or changes that may be implemented to prevent recurrence.
013-5.3 The resolution process will be documented for future reference if necessary.

013-6. Policy Compliance
013-6.1 Employees, volunteers, and contractors are expected to follow this policy and engage in the grievance process as outlined.
013-6.2 Violations of this policy, such as failure to adhere to the grievance procedure or engaging in retaliatory behavior, will result in corrective actions.

013-7. Periodic Review
013-7.1 This policy will be reviewed annually to ensure that it remains effective and aligned with the Foundation's values and operations.

013-7.2 Any necessary changes or improvements to the grievance process will be made in consultation with leadership and relevant stakeholders.

013-8. Policy Ratification

013-8.1 This policy was ratified by a vote of the full Board of Directors of the Donovan & Bank Foundation on March 2nd, 2023.

PAUL J TOOLAN

EXECUTIVE DIRECTOR

NOTARIZED:

Policy 013: Grievance Policy

Signature of Notary Public: _____

Printed Name of Notary: Kristian Z. Adams

Commission Number: _____

Commission Expires: 11/6/2029

State of: North Carolina

County of: New Hanover

KRISTIAN Z ADAMS
COMMISSION EXPIRES
NOTARY
PUBLIC
11/6/2029
NEW HANOVER COUNTY, N.C.

Policy 014: Nonprofit Investment Policy
Donovan & Bank Foundation
Effective Date: 2 March 2023

014-1. Purpose

014-1.1 The Donovan & Bank Foundation ("the Foundation") is committed to managing its financial resources in a responsible and sustainable manner. This policy outlines the principles and guidelines for the investment of the Foundation's funds.

014-1.2 The Foundation's investment approach is designed to ensure that funds are invested prudently and in a way that supports the mission and long-term financial health of the organization.

014-1.3 The goal of this policy is to provide a framework that balances risk and return, while ensuring the Foundation's resources are available to support its programs and operations.

014-2. Scope

014-2.1 This policy applies to all investments made by or on behalf of the Foundation, including but not limited to endowment funds, reserves, and any other funds intended for long-term growth.

014-2.2 It governs the Foundation's investment decisions and strategy, ensuring alignment with the Foundation's values and mission.

014-3. Investment Objectives

014-3.1 The primary investment objective is to preserve and grow the Foundation's assets while generating sufficient income to support its operations and mission-driven activities.

014-3.2 The Foundation seeks to balance risk and return by investing in a diversified portfolio that considers both short-term liquidity needs and long-term growth potential.

014-3.3 The Foundation's investments should be managed with the goal of ensuring that the capital is available to meet programmatic and operational needs over time.

014-4. Investment Guidelines

014-4.1 All investments must be made in a manner consistent with the Foundation's mission and values, avoiding any investments in industries or sectors that would directly contradict or conflict with the Foundation's purpose.

014-4.2 Investments should primarily focus on long-term growth, with a diversified mix of asset classes, including equities, fixed income, and alternative investments as deemed appropriate.

014-4.3 The Foundation may engage with investment advisors or professional managers to oversee the portfolio, but ultimate responsibility for investment decisions rests with the Board of Directors.

014-4.4 Investment decisions should be based on a careful analysis of risk and return, with an emphasis on diversification to protect against volatility and economic uncertainty.

014-5. Risk Management

014-5.1 The Foundation is committed to prudent risk management and aims to reduce

investment volatility by maintaining a diversified portfolio.
014-5.2 The investment strategy will aim to minimize risks that could significantly impact the Foundation's ability to fulfill its mission, including market, liquidity, and credit risks.
014-5.3 Investments in high-risk or speculative instruments are not permitted unless explicitly approved by the Board.
014-5.4 The Foundation will regularly monitor and evaluate the performance of investments and adjust the strategy as necessary to align with changing financial conditions.

014-6. Liquidity Needs
014-6.1 The Foundation will maintain sufficient liquidity to meet immediate operational needs, program commitments, and unforeseen expenses.
014-6.2 A portion of the Foundation's investments may be kept in highly liquid, low-risk instruments to ensure quick access to cash if needed.

014-7. Reporting and Oversight
014-7.1 The Board of Directors will regularly review the performance of the Foundation's investments and ensure that they are being managed according to this policy.
014-7.2 The Foundation's investment portfolio will be reported on quarterly, with a summary of performance, strategy, and any changes made during the reporting period.
014-7.3 The Board may engage an independent auditor or financial consultant to evaluate the Foundation's investment strategy and performance periodically.

014-8. Conflicts of Interest
014-8.1 Foundation members involved in investment decisions must disclose any potential conflicts of interest, including personal or financial interests that could influence their judgment.
014-8.2 Individuals with conflicts of interest are required to recuse themselves from relevant investment discussions or decisions.
014-8.3 The Foundation will maintain transparency and accountability in all investment-related activities.

014-9. Policy Compliance
014-9.1 Employees, Board members, and anyone involved in the investment process must comply with this policy.
014-9.2 Any deviations from this policy, whether intentional or unintentional, must be reported to the Board of Directors immediately for review.
014-9.3 Violations of this policy could result in corrective actions, including removal from investment decision-making processes or other disciplinary actions.

014-10. Periodic Review
014-10.1 This policy will be reviewed annually by the Board of Directors to ensure it remains effective and aligned with the Foundation's goals and financial needs.
014-10.2 Any necessary amendments or changes to the policy will be approved by the Board of Directors and communicated to all relevant parties.

014-11. Policy Ratification

014-11.1 This policy was ratified by a vote of the full Board of Directors of the Donovan & Bank Foundation on March 2nd, 2023.

PAUL J TOOLAN

EXECUTIVE DIRECTOR

NOTARIZED:

Policy 014: Nonprofit Investment Policy

Signature of Notary Public: _____

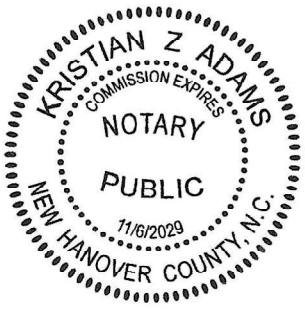
Printed Name of Notary: Kristian Z. Adams

Commission Number: _____

Commission Expires: 11/6/2029

State of: North Carolina

County of: New Hanover



Policy 015: Risk Management Policy
Donovan & Bank Foundation
Effective Date: 2 March 2023

015-1. Purpose

015-1.1 The Donovan & Bank Foundation ("the Foundation") is committed to identifying, assessing, and managing risks that could potentially affect its operations, reputation, and ability to fulfill its mission.

015-1.2 This policy outlines the Foundation's approach to risk management and establishes processes to minimize potential negative impacts on the Foundation's activities, stakeholders, and resources.

015-1.3 The Foundation's risk management practices are designed to be proactive, focusing on both identifying risks before they arise and responding quickly when they do.

015-2. Scope

015-2.1 This policy applies to all operations, activities, and personnel within the Foundation, including the Board of Directors, employees, volunteers, and contractors.

015-2.2 The Foundation's risk management practices will cover a broad range of risks, including but not limited to financial, operational, strategic, legal, reputational, and compliance risks.

015-3. Risk Identification

015-3.1 The Foundation will regularly assess potential risks that could affect its operations, programs, or financial stability.

015-3.2 Risks will be identified through ongoing monitoring, feedback from stakeholders, reviews of past incidents, and regular risk assessments.

015-3.3 All employees, volunteers, and Board members are encouraged to actively contribute to the identification of risks within their areas of responsibility.

015-4. Risk Assessment

015-4.1 Once risks are identified, they will be assessed based on their likelihood of occurrence and potential impact on the Foundation's mission and operations.

015-4.2 Risks will be categorized into high, medium, or low risk to prioritize their management.

015-4.3 A formal risk register will be maintained, documenting all identified risks, their assessments, and the strategies in place to mitigate them.

015-5. Risk Mitigation

015-5.1 The Foundation will implement strategies and actions to mitigate identified risks.

015-5.2 Mitigation strategies may include changes in operational processes, contingency planning, staff training, insurance, or other risk-reduction measures.

015-5.3 The Foundation will also establish crisis management protocols to address high-risk events and emergencies.

015-6. Risk Monitoring and Reporting

015-6.1 The Foundation will monitor the effectiveness of risk mitigation strategies on an ongoing basis to ensure they are working as intended.

015-6.2 The Board of Directors will receive regular reports on the status of the Foundation's risk management efforts, including any significant risks and actions taken to address them.

015-6.3 An annual risk management review will be conducted to evaluate the overall risk profile of the Foundation and identify new or emerging risks.

015-7. Legal and Regulatory Compliance

015-7.1 The Foundation will ensure that all activities comply with applicable federal, state, and local laws and regulations.

015-7.2 Legal risks will be managed by maintaining up-to-date knowledge of relevant laws and regulations, as well as consulting with legal experts when needed.

015-7.3 All Foundation policies and procedures will be reviewed periodically to ensure compliance with applicable laws.

015-8. Crisis and Incident Response

015-8.1 The Foundation will maintain a crisis response plan that can be activated in the event of a significant risk or emergency.

015-8.2 The plan will outline clear procedures for handling crises, including communication protocols, responsibilities of key personnel, and actions to minimize harm.

015-8.3 The crisis plan will be reviewed regularly, and training will be provided to staff and volunteers involved in crisis response.

015-9. Roles and Responsibilities

015-9.1 The Board of Directors is responsible for overseeing the Foundation's risk management efforts and ensuring the effective implementation of this policy.

015-9.2 The Executive Director and senior management team are responsible for managing day-to-day risk assessments, mitigation strategies, and monitoring processes.

015-9.3 All employees and volunteers must be aware of potential risks in their work and contribute to managing and mitigating those risks.

015-10. Policy Compliance

015-10.1 Employees, Board members, volunteers, and contractors are responsible for adhering to this policy and participating in risk management activities as needed.

015-10.2 Any violation of this policy or failure to follow risk management procedures will be addressed through appropriate corrective actions, including training, performance evaluations, or other disciplinary measures.

015-11. Periodic Review

015-11.1 This policy will be reviewed annually by the Board of Directors to ensure its relevance and effectiveness in managing risks.

015-11.2 Updates and amendments will be made as necessary to address new risks or changes in the Foundation's activities or operating environment.

015-12. Policy Ratification

015-12.1 This policy was ratified by a vote of the full Board of Directors of the Donovan & Bank Foundation on March 2nd, 2023.

PAUL J TOOLAN

EXECUTIVE DIRECTOR

NOTARIZED:

Policy 015: Risk Management Policy

Signature of Notary Public: _____

Printed Name of Notary: Kristian Z. Adams

Commission Number: _____

Commission Expires: 11/6/2029

State of: North Carolina

County of: New Hanover

KRISTIAN Z. ADAMS
COMMISSION EXPIRES
NOTARY
PUBLIC
11/6/2029
NEW HANOVER COUNTY, N.C.

Policy 016: Travel Policy
Donovan & Bank Foundation
Effective Date: 2 March 2023

016-1. Purpose

016-1.1 The purpose of this policy is to provide guidance on travel for employees of the Donovan & Bank Foundation, emphasizing trust, autonomy, and flexibility while ensuring a smooth, comfortable, and cost-effective travel experience. The policy also supports the Foundation's commitment to demonstrating care for its employees and maintaining agility in its operations, especially given the frequency of travel associated with the Foundation's work.

016-2. Scope

016-2.1 This policy applies to all employees of the Donovan & Bank Foundation who are required to travel for business purposes, including but not limited to conferences, workshops, meetings, and other Foundation events.

016-2.2 The policy is designed to empower employees to make their own travel arrangements with minimal oversight, while providing guidelines to ensure that travel is aligned with the Foundation's goals, mission, and budgetary considerations.

016-3. General Guidelines

016-3.1 Employees are trusted to make their own travel plans, using their judgment and experience to determine the most effective and efficient travel arrangements.

016-3.2 Travel should be planned with comfort, convenience, and cost-efficiency in mind. Employees are encouraged to select accommodations and travel methods that support their ability to perform at a high level for Foundation-related activities.

016-3.3 The Foundation prioritizes flexibility in travel, recognizing the need to adapt to changing schedules and last-minute adjustments. Employees are empowered to adjust travel dates as needed, within reasonable parameters, to better manage their time and reduce unnecessary travel strain.

016-3.4 The Foundation trusts its employees to make decisions that maintain the organization's goals and values. Travel autonomy reflects the Foundation's commitment to adaptability and empowering employees to respond quickly to dynamic circumstances.

016-4. Comfort and Well-Being

016-4.1 Employees should prioritize comfort when making travel decisions. The Foundation recognizes that the success of its mission depends on the health and performance of its team members, and as such, encourages comfortable travel arrangements that reduce stress and support wellness.

016-4.2 Employees are encouraged to consider upgrades to travel accommodations, such as business class seating or enhanced hotel amenities, if they contribute to a more restful and productive experience, and if they fall within budget considerations.

016-4.3 Travel-related health and wellness expenses may be reimbursed by the Foundation, including gym memberships, massage therapy, or other recovery services, to help mitigate the

physical and mental strain associated with travel.
016-4.4 Following long travel or international trips, employees may be entitled to a reasonable amount of rest and recovery time, as deemed appropriate based on the nature of the trip and workload upon return. This time should not interfere with ongoing Foundation operations and should be planned in advance when possible.

016-5. Travel Benefits Programs
016-5.1 Employees are permitted to participate in travel benefits programs, such as earning points for flights, hotel status, or other rewards. Employees may use these benefits for personal purposes and should not use them for Foundation business or expect reimbursement for them.
016-5.2 While employees are encouraged to use these benefits for personal gain, it is discouraged to use them for Foundation-related activities. However, employees may choose to donate these benefits back to the Foundation, but this is purely optional.
016-5.3 Travel rewards programs and accrued points may not be used for Foundation business nor compensated by the Foundation.

016-6. Emergencies
016-6.1 Employees are empowered to handle travel emergencies using their best judgment and experience. It is not necessary for employees to seek prior approval from leadership to resolve travel emergencies.
016-6.2 Employees are expected to resolve travel-related issues, such as flight cancellations, delays, or lost luggage, as quickly and efficiently as possible, without the need for leadership oversight.
016-6.3 In case of non-emergency travel issues (e.g., flight delays, lost luggage), employees may contact the Foundation's designated travel coordinator or a leadership member for assistance during business hours. Outside of business hours, employees are encouraged to use their discretion and act in accordance with the emergency procedures outlined in this policy.

016-7. Travel-Related Support for Family Members
016-7.1 The Foundation understands the importance of work-life balance and may consider assisting with travel costs for family members of employees when travel for a Foundation event requires extended periods away from home, subject to leadership approval and Foundation needs. This support is offered at the Foundation's discretion and is not guaranteed.

016-8. Travel Policy Compliance
016-8.1 Employees are expected to comply with the guidelines and principles outlined in this policy to ensure consistency, cost-effectiveness, and the well-being of the employee during travel.
016-8.2 The Foundation will periodically review this policy to ensure it continues to meet the needs of the organization and its employees while maintaining flexibility and responsiveness in all travel-related activities.

016-9. Policy Ratification

016-9.1 This policy was ratified by a vote of the full Board of Directors of the Donovan & Bank Foundation on March 2nd, 2023.

PAUL J TOOLAN

EXECUTIVE DIRECTOR

NOTARIZED:

Policy 016: Travel Policy

Signature of Notary Public: _____

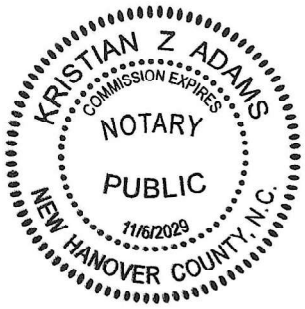
Printed Name of Notary: Kristian Z. Adams

Commission Number: _____

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Donovan & Bank Foundation

Board Member Acknowledgement and Policy Approval

Effective Date: 2 March 2023

This document serves as an official record that the Board of Directors of the Donovan & Bank Foundation ("the Foundation") has reviewed, discussed, and voted to approve the following policies contained in the Foundation's Policy Manual, as listed below. These policies were ratified by a vote of the full Board of Directors on March 2, 2023.

Policy 001: Conflict of Interest Policy

Policy 002: Whistleblower Protection

Policy 003: Document Retention & Destruction Policy

Policy 004: Anti-Discrimination Policy

Policy 005: Fundraising Policy

Policy 006: Compensation and Benefits Policy

Policy 007: Volunteer Policy

Policy 008: Code of Conduct and Ethics Policy

Policy 009: Dress Code Policy

Policy 010: Privacy and Confidentiality Policy

Policy 011: Health and Safety Policy

Policy 012: Social Media Policy

Policy 013: Grievance Policy

Policy 014: Nonprofit Investment Policy

Policy 015: Risk Management Policy

Policy 016: Travel Policy

Each policy has been reviewed and ratified with the intention of guiding the operations and management of the Foundation in a consistent, ethical, and legally compliant manner.

By signing below, the undersigned acknowledges their participation in the vote and their approval of the policies as outlined in this document.

Board Member Name: Christopher Miller

Date: March 2nd 2023

Signature:

Christopher E. Miller

Board Member Name: Joshua Forman

Date: March 2nd 2023

Signature:

Board Member Name: Thomas Aldrich

Date: March 2nd 2023

Signature:

Board Member Name: Paul J Toolan

Date: March 2nd 2023

Signature:

NOTARIZED:

Signature of Notary Public:

Printed Name of Notary: Kristian Z. Adams

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