

THE GOOD JOB HAPPY CO.

Whistleblower Policy

goodjobhappy.org

Adopted: June 2, 2026 Last Reviewed: _____

Applies To: Board Members, Officers, Employees, Volunteers, and Contractors

1. Purpose

The Good Job Happy Co. is committed to the highest standards of ethical, moral, and legal conduct. This Whistleblower Policy is intended to:

- Encourage board members, officers, employees, volunteers, and contractors to report good-faith concerns about suspected wrongdoing or violations of law or organizational policy;
- Provide a safe and confidential mechanism for reporting such concerns without fear of retaliation; and
- Ensure that concerns are promptly routed to the appropriate parties and addressed.

2. Scope

This policy applies to all individuals associated with The Good Job Happy Co., including board members, officers, employees (including supported employees with disabilities), volunteers, and contractors.

In addition, Direct Support Professionals (DSP staff) and employees of vocational partner organizations who work within The Good Job Happy Co.'s program environment are permitted reporters under this policy. While they are not subject to this policy as members or employees of The Good Job Happy Co., they are encouraged to report any concerns — particularly regarding the safety, welfare, or treatment of supported employees — using the reporting channels described in Section 4. All such reports will receive the same prompt attention as any other report submitted under this policy.

3. What to Report

A whistleblower is a person who, in good faith, reports activity believed to be illegal, dishonest, unethical, or in violation of organizational policy. Reportable concerns include but are not limited to:

- Financial fraud, theft, or misappropriation of funds or assets
- Falsification of financial records, grant reports, or donor communications
- Violations of federal, state, or local law
- Violations of the organization's bylaws or board-approved policies
- Conflicts of interest not properly disclosed per Article XIII of the Bylaws
- Abuse, neglect, or mistreatment of any individual, including supported employees
- Endangerment of health or safety
- Retaliation against anyone for reporting a concern in good faith

Reports made in bad faith, or that are knowingly false or malicious, are not protected by this policy and may result in disciplinary action.

4. How to Report a Concern

4a. Routing of Complaints

All complaints shall be directed as follows:

- All complaints go to Dean Hirschberg, Independent Director, as the primary recipient. Dean's role includes receiving, documenting, and triaging complaints, and directing them to the organization's attorney as appropriate.
- If the complaint involves Dean Hirschberg, it goes to Colin Ciszewski, Secretary.
- If the complaint involves both Dean Hirschberg and Colin Ciszewski, it goes to the full Board of Directors.

Dean Hirschberg serves as the gatekeeper for all complaints. His role is strictly limited to: receiving and documenting the complaint; acknowledging receipt to the reporter if identifiable; and directing the complaint to the organization's attorney and/or the full Board of Directors as appropriate. Dean Hirschberg does not conduct investigations and has no unilateral authority to assess, resolve, or impose consequences. Any action resulting from a whistleblower complaint requires a majority vote of the full Board of Directors, consistent with Article VI of the Bylaws.

The Founder (Tricia Jeziorny) shall recuse herself from discussion and voting on any complaint in which she is named or has a conflict of interest, consistent with Article XIII, Section 13.3 of the Bylaws. Nothing in this policy alters the Founder protections set forth in Article XI of the Bylaws.

4b. Anonymous Reporting

Anonymous reports are accepted. All anonymous concerns will be reviewed and addressed to the extent possible. Anonymous reports should be submitted in writing, clearly marked confidential, to Dean Hirschberg or, if the complaint involves Dean Hirschberg, to Colin Ciszewski, using the contact information in Section 4c below.

4c. Contact Information

Dean Hirschberg, Independent Director (Primary Recipient)

Colin Ciszewski, Secretary (If Complaint Involves Dean Hirschberg)

5. Confidentiality

The organization will make every reasonable effort to keep the identity of a reporting individual confidential, consistent with the need to conduct a thorough investigation and comply with applicable law. All parties involved in an investigation are expected to maintain strict confidentiality throughout the process.

6. Non-Retaliation

The Good Job Happy Co. strictly prohibits retaliation against any person who, in good faith, reports a concern under this policy or participates in an investigation. Prohibited retaliation includes termination, demotion, harassment, intimidation, or any other adverse action that would discourage a reasonable person from reporting a concern.

Any person who engages in retaliation will be subject to disciplinary action, up to and including removal from the board, termination of employment, or termination of a volunteer or contractor relationship.

If you believe you have experienced retaliation, report it immediately to Dean Hirschberg or, if he is involved, to Colin Ciszewski.

7. Investigation Procedures

Upon receipt of a complaint, the designated gatekeeper (Dean Hirschberg, or Colin Ciszewski if the complaint involves Dean Hirschberg) will:

- Acknowledge receipt within five (5) business days if the reporter is identifiable;
- Document the complaint in writing, noting the date received, nature of the concern, and identity of the reporter (if known);

- Direct the complaint promptly to the organization's attorney and/or the full Board of Directors as appropriate, ensuring no individual with a conflict of interest is involved in the routing decision; and
- Maintain a confidential record of all complaints received and actions taken.
- Present the complaint and all documentation to the full Board of Directors for review and action by majority vote.

The gatekeeper should direct complaints to the organization's attorney and/or the full Board within ten (10) business days of receipt. Any resulting action — including disciplinary measures, policy changes, or referrals to outside authorities — requires a majority vote of the full Board.

8. Special Considerations for Supported Employees

The Good Job Happy Co. employs adults with intellectual disabilities and autism. This organization is committed to ensuring these employees are made aware of this policy in an accessible format and that their concerns receive the same prompt attention as any other report. Supported employees may raise a concern through a trusted job coach, family member, advocate, or directly through the channels described in Section 4.

DSP staff and vocational partner employees who observe concerns related to the safety, welfare, or treatment of supported employees are also encouraged to report those concerns under this policy, as described in Section 2. Their reports will be treated with the same urgency and confidentiality as any other report.

Any report of abuse, neglect, or mistreatment of a supported employee will be treated as a priority and may be reported to the appropriate Connecticut state agency in accordance with applicable law.

9. Recordkeeping

All whistleblower complaints and related documentation will be maintained by the gatekeeper in a secure, confidential file accessible only to authorized board members and the organization's attorney. Records will be retained for a minimum of seven (7) years.

10. Relationship to Bylaws

This policy operates in conjunction with and subject to the Bylaws of The Good Job Happy Co., including:

- Article XI (Founder Protections) — Nothing in this policy alters the Founder's rights, lifetime board seat, or veto power over Protected Matters.

- Article XIII (Conflict of Interest) — Recusal requirements apply to all whistleblower investigations.
- Article XV, Section 15.1 — This policy fulfills the Bylaws' requirement to maintain a Whistleblower Policy.

In the event of any conflict between this policy and the Bylaws, the Bylaws shall govern.

11. Policy Review

This policy will be reviewed annually by the Board of Directors and updated as necessary. Amendments require a majority vote of the Board, subject to Founder approval consistent with the Bylaws.

12. Board Adoption

This Whistleblower Policy was reviewed and adopted by the Board of Directors of The Good Job Happy Co. on the date indicated above.

Board Chair Signature: _____

Date: 6/2/2026

Printed Name: Tricia Jezierny
Chair

Title: Founder / Executive Director /

Secretary Signature: Colin Ciszewski

Date: 6/2/2026

Printed Name: Colin Ciszewski

Title: Secretary

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