

VECINOS UNIDOS NEIGHBORS UNITED

Whistleblower and Anti-Retaliation Policy

Vecinos Unidos Neighbors United (the “Organization”) is committed to compliance with all applicable laws and all directors, officers, employees, consultants, and volunteers of the Organization should feel safe to report any ethical or legal concerns about the Organization that are reasonable and made in good faith without fear of reprisal. It is a violation of this policy for anyone, acting on behalf of the Organization, to retaliate against an individual who in good faith reports a possible violation of this policy.

As part of its commitment to ethical and legal conduct, the Organization expects its directors, officers, employees and consultants to bring to the attention of the Board of Directors, or a person it designates, information about any ethical, financial or legal concerns about the Organization or about known or reasonably suspected violations of this policy by other individuals. Financial complaints include, but are not limited to, suspected improper accounting, internal accounting controls or auditing. Complaints should be made according to the following procedure:

1. Notification.

a) *Whom to Notify.* Individuals with a complaint or knowledge of a complaint should promptly notify the Organization of the complaint by contacting any member of the Board of Directors. Notifications may be made anonymously.

Because failure to report criminal activity can itself be understood to condone the crime, individuals should come forward with information about any such activity, without regard for the identity or position of the suspected offender. Failure to report knowledge of wrongdoing may result in disciplinary action against those who fail to report.

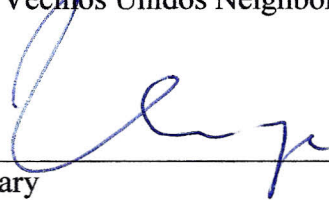
b) *Form of Notice.* The notification should specify in reasonable detail the nature of the complaint and the persons involved in and with knowledge of the violation. It should be accompanied by any supporting documentation. Notification should, if at all possible, be made in writing so as to promote a clear understanding of the issues raised, but also may be made orally.

2. Investigation and Confidentiality. The Organization will investigate reports of violations and all those involved are required to cooperate with such investigations. An investigation may in some circumstances mean that the Organization cannot promise complete confidentiality, but it will act as discreetly as reasonably possible, providing information to individuals on a “need to know basis.” When the Organization completes its investigation, it will promptly take corrective action to address any problems which have been identified.

3. Prohibition Against Retaliation. The Organization will not discriminate against or discharge individuals for their reasonable, good faith allegations or participation in any investigation, or their reasonable, good faith efforts to ensure the Organization’s compliance with

law, and it will strongly discipline anyone who threatens or retaliates against such individuals. Such prohibited retaliation includes, but is not limited to, termination, demotion, suspension, harassment, failure to consider for promotion, or any other kind of discrimination. Individuals should act reasonably and in good faith during any complaint and investigation process.

Adopted by resolution of the Board of Directors of Vecinos Unidos Neighbors United at a duly held meeting on June 12, 2009.


Secretary