**WHISTLEBLOWER POLICY**

**CLIMATE STEPS**

ARTICLE I

PURPOSE

The purposes of this whistleblower policy are for Climate Steps (the "Corporation”) to enhance compliance with the Sarbanes-Oxley Act and to promote corporate integrity by enabling employees, officers, and others to raise any serious concerns about the Corporation.

ARTICLE II

POLICY

Section 1 Filing of Complaints. Employees, directors, volunteers, and officers are encouraged, in good faith, to report to the Board of Directors or senior staff any violations of law or policy, any financial irregularities, and any other suspected wrongdoing or conduct, including any attempts to conceal any such conduct, that could damage the Corporation's good name, interests, and relationships with supporters and the community at large.

Section 2 Confidentiality Permitted. Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Section 3 Investigating. Handling, and Documenting Complaints. The Board of Directors and senior staff shall ensure the investigation and resolution of all reported complaints and allegations of misconduct in a reasonably prompt manner. The resolution of such complaints or concerns shall be reported to the Board of Directors, to senior staff, and to the complainant, and shall include a report of any appropriate corrective action taken or planned to address the issues raised. A record of all material complaints and concerns shall be maintained.

Section 4 Protection of Whistleblowers. No one who in good faith reports any suspected problem or wrongdoing shall suffer harassment, retaliation or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

Section 5 Acting in Good Faith. Anyone filing a complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Anyone who makes allegations in bad faith or without any reasonable basis, and which allegations prove to have been made maliciously or knowingly of the falseness, can be subject to discipline, up to and including termination of employment.