



PlanetRead US Organizational Policies

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*PlanetRead is a registered not for profit, 501 (c) (3)
26, Manor Drive, Piedmont, CA 94611, USA*

1. Whistleblower Policy

PlanetRead (or, “the organization”) strives to function with a high level of professionalism, honesty, integrity, and ethical behavior. It is committed to open communication and values conducting its activities in a fair and transparent manner. PlanetRead requires its employees, officers, directors, and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Any actual or potential violation of these values would be a matter of serious concern for the organization.

The objective of this whistleblower policy is to encourage and enable employees to come forward and raise a concern on any behaviour or activities that are in contravention with PlanetRead’s organisational values and/or applicable laws, to a source within the organisation before turning to outside parties for resolution.

This policy is applicable to the employees of PlanetRead and is meant to be a safeguard and protection to them. This policy applies to any matter which is related to the organization’s business and does not relate to private acts of an individual not connected to its business. Any person making a disclosure under this policy, i.e., a complainant or whistleblower, is required to refer to the policy.

Policy

Under this policy, employees of the organization may report any action or suspected action taken within the organization that is illegal, fraudulent or in violation of PlanetRead’s adopted policies. Anyone reporting must act in good faith, without malice to PlanetRead or any individual in PlanetRead, and have reasonable grounds for believing that the information shared in the report indicates that wrong-doing has occurred. Any report which the complainant has made maliciously or any report which the complainant has good reason to believe is false will be viewed as a serious disciplinary offense, and PlanetRead reserves the right to take disciplinary or legal action in such event.

A complainant may, if they choose, provide corroborating information in their report (for instance, documents, media, photographs, messages, chats, mails, etc.) in order to substantiate the complaint. The complainant shall not conduct their own audits or investigate such incidents and may merely lodge a complaint with the designated personnel within the organization as per the process set out below.

Procedure of Disclosure

The complainant shall provide their report in an e-mail to the Chairperson of PlanetRead’s Governing Board (or, “the Board”) to whistleblower@planetread.org. If the Board’s Chairperson is implicated, then the submission of the report is to be made to the Board’s Co-Chair. The complainant should disclose their name and contact details in the email to support the investigation into the matter in a fair and transparent manner.

The Board’s Chair shall keep the subject matter of the disclosure (including the identity of any named person(s) in the disclosure and the complainant themselves) confidential and not share these details with any third parties to the extent possible, consistent with the need to conduct an adequate investigation, to comply with all applicable laws, and to cooperate with law enforcement authorities.

Furthermore, PlanetRead will explore anonymous allegations to the extent possible, but will weigh the prudence of continuing such investigations against the likelihood of confirming the alleged facts or circumstances from attributable sources.

The Board's Chairperson is responsible for promptly investigating all reported violations and for causing appropriate corrective action to be taken if warranted by the investigation. The complainant will be notified about what actions will be taken, to the extent reasonably possible and consistent with any privacy or confidentiality limitations.

If no further action or investigation is to follow, an explanation for the decision will be given to the complainant. The Board Chair may at their discretion invite external investigator(s) or adjudicator(s) for the purpose of the investigation. If any of the committee members has conflict of interest with the subject matter, they shall recuse themselves from the investigation and an alternate committee member will step in and deal with the matter.

The report containing details of the disclosure, the Chairperson's findings and decision to PlanetRead's board. If an investigation leads the board to conclude that an improper or unethical act has occurred, then it shall recommend to take such disciplinary or corrective action as they may deem fit.

No Retaliation

PlanetRead condemns all kinds of discrimination, harassment, victimization and unfair employment practices. No unfair treatment will be meted out to a complainant by virtue of them having made a disclosure under this policy.

Complete protection will be accorded to whistleblowers against any unfair practice such as retaliation, intimidation, threat of termination or suspension of service, disciplinary action, demotion, refusal of promotion or the like, including any direct or indirect use of authority to obstruct the whistleblower's right to continue to perform their professional duties or make further disclosures.

2. Document Retention and Destruction Policy

This Document Retention and Destruction Policy provides for the systematic review, retention and destruction of records received or created by PlanetRead (or, the “organization”) in connection with the transaction of its business. This policy covers all records, regardless of physical form, and contains guidelines for duration of time for records to be kept. A record is any material that contains information about PlanetRead’s business or business plans, clients, vendors, donors, subcontractors, results, policies, or performance. Anything that can be represented with words or numbers is a business record for purposes of this policy.

Record Retention

PlanetRead follows the document retention procedures outlined below. Documents that are not listed, but are substantially like those listed in the schedule will be retained for the appropriate length of time. While the listings below contain commonly recognized categories of records, it is not an exhaustive list. *Employees should consult PlanetRead’s legal counsel with respect to any queries pertaining to classification of records or the processes highlighted in this policy.*

A. Permanent Retention

Permanent records – Permanent records are records required by law to be permanently retained and which are ineligible for destruction at any time for any reason. These records are necessary for the continuity of business and the protection of the rights and interests of the organization. These include records such as organizational documents (Articles of Incorporation and Bylaws), Board minutes and policies, federal and state tax exempt status and independent audits.

No record, whether referenced or not, may be destroyed if in any way the records refer to, concern, arise out of or in any other way are involved in pending litigation.

Corporate Records - Permanent

- Annual Reports to Secretary of State/Attorney General
- Articles of Incorporation
- Board Meeting and Board Committee Minutes
- Board Policies/Resolutions
- By-laws
- Construction Documents
- Fixed Asset Records
- IRS Application for Tax-Exempt Status (Form 1023)
- IRS Determination Letter
- State Sales Tax Exemption Letter

Accounting and Corporate Tax Records - Permanent

- Annual Audits and Financial Statements
- Depreciation Schedules
- General Ledgers
- Check Register
- IRS 990 Tax Returns

Payroll and Employment Tax Records - Permanent

- Payroll Registers
- State Unemployment Tax Records

Employee Records - Permanent

- Employment and Termination Agreements
- Retirement and Pension Plan Documents

Legal, Insurance and Safety Records - Permanent

- Appraisals
- Copyright Registrations
- Environmental Studies
- Insurance Policies
- Real Estate Documents
- Stock and Bond Records
- Trademark Registrations

B. Non-permanent retention

Non-permanent records – Certain records are not required by law to be permanently retained and may be destroyed, at PlanetRead personnel's discretion after the passage of certain years or upon the passing of events as defined by this policy.

These may include corporate records like contracts and correspondence, employee records relating to promotion, demotion, accounting records like petty cash vouchers, credit card receipts, etc.

Destruction of records may be accomplished by shredding, in case of physical records and permanent digital deletion, in case of electronic records. Document destruction must be suspended immediately, upon any indication of an official investigation or when a lawsuit is filed or appears imminent. Destruction will be reinstated upon conclusion of the investigation or claim, whichever is latest.

3. Donation and Gift Acceptance Policy

The purpose of PlanetRead's Donation and Gift Acceptance Policy is to outline its procedures for accepting private donations. Acknowledgment of gifts made by donors allows them to have the records they need to verify their charity with the tax authorities. Acknowledgment of gifts can encourage more donations. PlanetRead invites and accepts donations that are consistent with advancing its mission objectives and strategic vision and in line with its policies and applicable regulations.

Donations and other forms of support will generally be accepted from individuals, partnerships, corporations, foundations, government agencies, or other entities, subject to the ability of the gift to advance the organization's mission objectives and strategic vision, and the capacity of PlanetRead to manage the donation without detracting from these. Employees are encouraged to seek the advice of legal counsel and the Finance department in matters relating to acceptance of gifts when appropriate.

PlanetRead reserves the right to accept or deny any gift for any reason. PlanetRead shall not accept gifts that (i) violate the terms of its organizational/constituent documents and policies or (ii) would jeopardize PlanetRead's status as a 501(c)(3) tax exempt organization under federal and state law.

In some cases, a gift may be considered inappropriate due to restrictions imposed by the donor, the nature of the gift, or for some other reason, and may not be accepted. PlanetRead may not be able to accept gifts for which there is no ready market to liquidate for cash or where the value of the item is difficult to ascertain or is speculative. On occasion, PlanetRead might give it consideration. Before the gift is accepted, it must first be evaluated by the relevant personnel, who will make their recommendations to the Board. The Board will make the final decision.

PlanetRead does not provide legal, accounting, tax, or other advice to prospective donors. Therefore, each prospective donor is urged to seek the advice of independent legal counsel in the gift planning process and is responsible and accountable for ensuring any gifts they make to PlanetRead are in accordance with PlanetRead's policies and applicable legal regulations.

4. Conflict of Interest Policy

PlanetRead has adopted this policy to avoid and mitigate any conflicts of interest. This Policy applies to all personnel of PlanetRead, including employees, directors, officers, consultants, or board members.

PlanetRead personnel should abstain from acting on the organization's behalf in matters where a conflict of interest exists or may arise. They should also endeavour to avoid any situation that might lead to or create a conflict of interest or the appearance of a conflict of interest. PlanetRead personnel should always perform their responsibilities in the best interests of the organization. PlanetRead personnel should be free from any undue influence that may benefit themselves or other third-parties when performing their duties.

A conflict of interest refers to a circumstance where an individual has a personal interest to the extent that it affects, directly or indirectly, the individual's performance of duties at or in relation to PlanetRead. Conflicts of interest may arise in the relations of personnel with third parties including persons and firms supplying goods and services to PlanetRead, competing or affinity organizations, donors and others supporting PlanetRead or family members, friends, and other employees.

Such an interest may arise through having ownership in any third party that deals with PlanetRead, holding office, serving on the board, participating in management, or being otherwise employed with any third party that deals with PlanetRead, receiving remuneration for services with respect to individual transactions involving PlanetRead, using PlanetRead's personnel and resources for other than PlanetRead-approved activities, programs, and purposes, or receiving personal gifts or loans from third parties dealing or competing with PlanetRead. Receipt of any gift is disapproved except gifts of a value less than \$50, which could not be refused without discourtesy. No personal gift of money should ever be accepted.

If any personnel seek to engage in a transaction in which a conflict of interest exists or may arise, they must first provide a written disclosure of the same to the board. The board shall determine whether a conflict exists and in the case of an existing conflict, whether the contemplated transaction may be authorized as just, fair, and reasonable. The decision of the board on this matter will rest in their sole discretion, and their concern must be the welfare of the organization and the advancement of its purpose.

5. Anti-Bribery and Anti-Corruption Policy

PlanetRead is committed to maintaining the highest possible ethical standards in all its dealings and operations as an organization. It is PlanetRead's policy to comply with all applicable Anti-Bribery and Anti-Corruption laws including, but not limited to, the US Foreign Corrupt Practices Act (FCPA).

Accordingly, PlanetRead prohibits anyone acting on behalf of the organization from making or receiving improper payments, either directly or indirectly. Improper payments mean receiving or paying bribes or giving, offering, or promising to give money or anything else of value to any person or entity, whether to any government official or to a private entity, in order to improperly influence any act or decision of a person, or to otherwise gain an improper benefit for the organization.

The use of PlanetRead funds or assets for any illegal, improper, or unethical purpose is strictly prohibited. Compliance with this policy is required of all employees and/or sub-contractors of the organization. Any employee or sub-contractor who violates this policy in connection with PlanetRead's operations will be subject to disciplinary measures, up to and including termination in the case of an employee, or termination of business relations and suspension of contractual arrangements in the case of a sub-contractor and, where appropriate, referral of the matter to relevant law enforcement authorities.

An employee or sub-contractor who has information that this policy or related procedures may have been violated, or believes he or she is being asked to pay a bribe or receive a bribe, or otherwise act in contravention of this policy shall immediately report the event directly to the legal department of PlanetRead. All such reporting will be treated confidentially, to the extent possible.