

THE NOBODY'S CATS FOUNDATION

CONFIDENTIALITY POLICY

It is impossible to overstate the importance of confidentiality.

In the course of your work with The Nobody's Cats Foundation you will undoubtedly have access to confidential information. It's one of your most serious responsibilities that you in no way reveal any such information and that you use it only in the performance of your duties. Should you have doubts about what might be considered confidential information or a violation of trust, you should seek advice from the Executive Director.

- (a) Employees are responsible for the internal security and safekeeping of such information. It is your responsibility to read and follow the policies on protecting information.
- (b) Employees are prohibited from engaging in securities transactions on the basis of information not available to the general public and that, if known to outsiders, might affect their investment decisions. The dissemination of such information to others who might make use of that knowledge to trade in securities is also prohibited.
- (c) Proprietary and confidential information can take many shapes, including, but not limited to; names, documents, notes, overheard conversations, tapes, diskettes, personal observations, records, research, blueprints, financial statements, licensing agreements, trust funds, criminal records, strategic plans, product developments, emails, pending patents, research proposals, chemical or biologic formulae.
- (d) Employees will be required to sign a statement of confidentiality at the time of hire and annually throughout their term of employment to acknowledge their awareness of, and to reaffirm their commitment to, this policy.
- (e) Employees are expected not to divulge, during their term of employment or after their employment is terminated, any information confidential or proprietary information acquired during their employment.
- (f) Information regarding the operations, activities, and business affairs of The Nobody's Cats Foundation are also to be kept confidential and not discussed with outsiders.
- (g) Employees found to be in violation of The Nobody's Cats Foundation's confidentiality policies are subject to disciplinary action, up to and including termination, and may also be subject to civil and/or criminal penalties for violations of, among other things, applicable securities laws.

(h) In preserving the security of files and information, the following are to be observed:

1. Disclosing information – Information in office files should never be disclosed, except upon express authorization of the Executive Director.
2. Delivery of documents – Documents or files are to be turned over only to persons who are properly identified or vouched for and then only in return for a signed receipt and when authorized by the Executive Director.
3. Use of offices – In an employee’s absence, no client, visitor or stranger may use an employee’s office for any purpose unless a member of the office staff is present the entire time. Even if monitored, the desk should be such that files, papers, and correspondence are not exposed. Under no circumstances should a client, visitor, or stranger place a telephone call from an employee’s office.
4. Disposal of confidential papers. All confidential papers should be destroyed when no longer needed. This includes rough drafts or interim copies. Paper shredders are located in throughout the office for that purpose.
5. Revealing client’s business. One client’s business is never to be discussed with another client. As general policy, it is best not to mention one client’s name to another. The temptation to brag about our important clients should be resisted.
6. Discussing The Nobody’s Cats Foundation matters. Do not discuss company matters when clients or visitors are present, particularly in the reception or kitchen areas. A visitor or client who overhears information concerning another of our clients will feel that his or her personal affairs will receive the same lax treatment.
7. Exposure of documents. Copies of correspondence, pleadings, interoffice memoranda, or any other documents should be placed either on a designated tray on the secretary’s desk or on the lawyer’s desk. Tray covers are provided by the firm.

Adopted by The Nobody’s Cats Foundation Board of Directors: January 25, 2012.

I have read, understand and agree to the provisions herein.

Board Member/Employee’s Signature

Date

THE NOBODY'S CATS FOUNDATION POLICY
ON REPORTING IMPROPRIETIES, FRAUDULENT
OR DISHONEST CONDUCT

It is the policy of The Nobody's Cats Foundation to safeguard and protect all of the nonprofit's resources. The Executive Committee is primarily responsible for safeguarding the nonprofit's resources by establishing and maintaining sound internal controls designed to deter and detect potential misuse of resources, by taking action to minimize financial loss when misuse occurs, and by correcting abuse. All employees and board members are responsible for reporting improprieties they observe.

The Executive Committee will investigate any possible impropriety, fraudulent or dishonest use or misuse of The Nobody's Cats Foundation resources or property by board, staff, or program participants. Anyone found to have engaged in an impropriety or fraudulent activity is subject to disciplinary action by the Executive Committee up to and including termination or dismissal, and civil or criminal prosecution when warranted.

All members of The Nobody's Cats Foundation's staff, board, and stakeholder community are to report possible fraudulent or dishonest conduct (including but not limited to financial improprieties or misuse of The Nobody's Cats Foundation resources) confidentially to the President. If, for any reason, an employee finds it difficult to report his or her concern to the President, the employee can report it directly to the Financial Committee Chairman.

A few examples of fraudulent conduct or impropriety include:

- Forgery or alteration of documents;
- Pursuit of a benefit or advantage in violation of The Nobody's Cats Foundation's conflict of interest policy;
- Misappropriation or misuse of organization's resources, such as funds, supplies, other assets;
- Abuse, inappropriate activity with a program participant;
- Authorizing or receiving compensation for goods not received, service not performed or hours not worked; and
- Fraudulent financial reporting.

Criteria used to determine whether certain activities or behavior constitute misuse of resources include state and federal laws, and The Nobody's Cats Foundation's policies and procedures.

All efforts will be made to provide confidentiality to those reporting financial improprieties. However, in certain situations, legal requirements make confidentiality impossible.

Adopted by "The Nobody's Cats Foundation" Board of Directors: January 25, 2012.