

Policy for Reporting Concerns about Unlawful or Unethical Conduct (Whistleblower Policy)

The Foundation is a beneficiary of the public trust. Therefore, our staff members must act in accordance with the highest standards of professional integrity in all aspects of their activities with the Foundation. This includes, but is not limited to:

- Engaging in and promoting honest and ethical conduct.
- Avoiding conflicts of interest and disclosing relationships that could give rise to a conflict.
- Declining gratuities or significant gifts that were given with the hope or expectation of influencing decision making on behalf of the Foundation.
- Taking reasonable measures to protect confidential information.
- Taking reasonable measures to guard against the unauthorized use or dissemination of Foundation assets, such as proprietary information, materials, supplies, time, software, hardware, facilities, and other property, including intellectual property (patents, trademarks, trade secrets, and copyrights), databases, records, salary information, and any unpublished data, books, records, accounts, and financial statements.
- Promoting full, fair, accurate, timely, and understandable accounting records, in accordance with generally accepted accounting principles.
- Complying with applicable governmental laws, rules, and regulations with respect to not-for-profit organizations and other businesses.
- Abiding by the Foundation's written and oral policies and procedures that govern conduct in the workplace.
- Taking reasonable measures to deter wrongdoing and promptly reporting any possible violation of the Foundation's policies and procedures or any applicable governmental law, rule, or regulation.

If a Foundation employee has any questions regarding the best course of action in a particular situation or has actual knowledge or a reasonable belief that the Foundation or anyone connected with the Foundation has engaged or is engaging in unlawful or unethical conduct, they (referred to here as a "Reporting Person") should immediately discuss their concerns with their supervisor, the Chief Talent & Culture Officer, the Chief Operating Officer, or the President and CEO.

Reports of unlawful or unethical conduct can be made verbally to your supervisor, Talent & Culture or in situations in which you prefer to place an anonymous report in confidence, you are encouraged to use this hotline, hosted by a third-party hotline provider, EthicsPoint (www.skoll.ethicspoint.com). Your report should contain all pertinent details to allow an appropriate inquiry into the matter to begin. All reports received will be acted upon in confidence to the maximum extent possible given legal requirements and the need to gather additional facts, conduct an effective inquiry, and take necessary and appropriate responsive action.

If, after reporting a matter to a supervisor, Chief Talent and Culture Officer, the President & Chief Operating Officer, or CEO, or via the hotline (EthicsPoint), the Reporting Person believes that their concerns have not been adequately addressed, the Reporting Person may then report the matter to another one of those three persons.

In addition, under the following circumstances a Reporting Person may report concerns of unlawful or unethical conduct to the board Chair or their designee:

- if a report involves, or is believed to involve, conduct of all three of the persons listed above,
- if a report to one of the persons listed above is not acted upon and may involve conduct of one or more of the other persons, or
- if the matter has not been properly addressed after being reported to a second person listed above.

Any report to the board Chair or their designee must be first reported through the EthicsPoint hotline (online or by phone) identify the steps previously taken to report the matter.

The Foundation will take such appropriate remedial and disciplinary action as it deems justified by the circumstances. These actions may include termination of employment or removal from office, seeking restitution, and/or reporting the matter to a law enforcement agency. The Foundation may take action against a person who has engaged in unlawful or unethical conduct even if they cooperated with the investigation. The Foundation retains discretion to limit reporting the results of an inquiry with the Reporting Person, depending on the circumstances, the need to protect confidentiality, and the requirements of applicable law.

The Foundation will not tolerate retaliation, whether direct or indirect, against any person who makes a good-faith report under this policy. However, the Foundation may take action against any person who has filed a complaint without having a reasonable belief in the truth of the matters reported.