



Whistleblower Policy

The Osteogenesis Imperfecta Foundation requires that its directors, officers, employees, and volunteers observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the Foundation, we must practice honesty and integrity in fulfilling our responsibilities and complying with all applicable laws and regulations.

In furtherance of this goal, it is the responsibility of all directors, officers, and employees to comply with these standards and to report suspected or actual occurrences of illegal, unethical, fraudulent, or inappropriate events (behaviors and practices), or violations of any of the OI Foundation's adopted policies (each, a "Violation") in accordance with this Whistleblower Policy. This includes but is not limited to theft, financial reporting that is intentionally misleading, improper or undocumented financial transactions, improper destruction of records, improper use of assets, violations of the organization's conflict of interest policy, any other improper occurrences regarding cash, financial procedures, or reporting.

To encourage its directors, officers, employees, and volunteers to report Violations in the workplace and to protect any such directors, officers, employees, and volunteers from retaliation for making any such report in good faith, the Board of Directors of the Foundation (the "Board") adopts these whistleblower policy guidelines:

- 1. Reporting Responsibility.** It is the responsibility of all directors, officers, employees, and volunteers to report Violations or suspected Violations in accordance with this Whistleblower Policy.
- 2. Reporting Violations.** In most cases, employees and volunteers should report Violations or suspected Violations to their immediate supervisor. If the employee or volunteer would be uncomfortable or otherwise reluctant to report to his/her immediate supervisor, then he/she could report the event to the next highest or another level of management, including to an appropriate member of the Board. Directors and officers should report Violations or suspected Violations to the Chief Executive Officer and to the full Board.

3. **Confidentiality.** 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.

4. **No Retaliation.** No director, officer, employee, or volunteer who in good faith reports a Violation or suspected Violation shall suffer harassment, retaliation, or adverse employment consequence. A director, officer, employee, or volunteer who retaliates against someone who has reported a Violation in good faith is subject to discipline up to and including termination of Board, officer, employee, or volunteer status. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within the Foundation prior to seeking resolution outside the Foundation.

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. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense. A Whistleblower who makes a report that is not done in good faith is subject to discipline, including termination of the Board, officer, employee, or volunteer relationship, or other legal means to protect the reputation of the organization and members of its Board and staff.