



**EB** RESEARCH  
PARTNERSHIP

## **Whistleblower Protection Policy**

*(Last revised September 2016)*

EB Research Partnership (“EBRP”) requires its directors, officers, employees, representatives and grantees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities in support of EBRP’s mission to Heal EB. This policy regarding whistleblower protections (the “EBRP Whistleblower Policy”) is intended to encourage and enable EBRP’s directors, officers, employees, representatives, grantees and anyone else with whom EBRP works to raise their concerns through appropriate internal channels so that EBRP can address and correct inappropriate conduct and actions.

### **Duty to Report**

Each director, officer, employee, representative and grantee of EBRP is empowered and duty-bound to report, in good faith and upon a reasonable basis, concerns about suspected violations of EBRP’s Conflicts of Interest Policy or of any law or regulation governing EBRP’s operations and activities.

### **No Adverse Action**

EBRP will take all reasonable efforts to ensure that neither EBRP nor any director, officer, employee or other person acting on behalf of EBRP will take any adverse action against any person (a “Whistleblower”) who, in good faith, reports a suspected violation of EBRP’s Conflicts of Interest Policy or of any law or regulation governing EBRP’s operations and activities. Whistleblower actions protected under this policy include, without limitation, complaints of discrimination, suspected misuse or prohibited disclosure of confidential or proprietary information, suspected fraud or misappropriation of funds, and suspected violations of federal, state and/or local tax laws and regulations applicable to EBRP. Any director, officer, employee, representative or grantee of EBRP who takes an adverse action against a Whistleblower acting in good faith will be subject to discipline, which may include, as applicable, termination of employment, suspension or removal from office and/or other available remedies.

## **Reporting Procedure**

EBRP has an open door policy and urges its directors, officers, employees, representatives, grantees and others to report their questions and concerns regarding suspected violations of EBRP's Conflicts of Interest Policy or of any law or regulation governing EBRP's operations and activities, or any suspected adverse action against a Whistleblower, orally or in writing, to the Chairman or another member of the Executive Committee. If you are not comfortable reporting to the Chairman or another member of the Executive Committee or you are not satisfied with the response, you are encouraged to contact Richard A. Grossmann ([richard@ebresearch.org](mailto:richard@ebresearch.org); 617-372-7071) and/or Jeffrey Berger ([jeff@ebresearch.org](mailto:jeff@ebresearch.org); 312-285-6123) (the "Whistleblower Compliance Contacts").

## **Investigation of Reported Matters**

The Whistleblower Compliance Contacts will have the responsibility to ensure that all reported questions and concerns regarding suspected violations of EBRP's Conflicts of Interest Policy or of any law or regulation governing EBRP's operations and activities, or any suspected adverse action against a Whistleblower are investigated and resolved in a timely manner. The Whistleblower Compliance Contacts will act independently of the Executive Committee but will keep the Chairman and the other members of the Executive Committee regularly apprised of all reported matters and the status of their resolution.

## **Accounting and Auditing Matters**

In addition, the Whistleblower Compliance Contacts will promptly report any reported matters relating to corporate accounting practices, internal controls or auditing to the Audit Committee. The Whistleblower Compliance Contacts will work with the Audit Committee and EBRP's auditors, as appropriate, until the matter is resolved, and will report on the resolution to the Board of Directors.

## **Confidentiality**

EBRP, the Executive Committee, the Audit Committee, the Board of Directors and the Whistleblower Compliance Contacts will use all reasonable efforts to maintain the confidentiality of any good-faith Whistleblower, to the extent consistent with the investigation and reporting obligations set forth in this policy and with legal requirements.