

BREAST CANCER ALLIANCE WHISTLEBLOWER POLICY

General Statement

Breast Cancer Alliance (**the "BCA"**) is committed to observing high standards of legal and ethical business conduct. The Breast Cancer Alliance expects its officers, directors and employees to exercise honesty and integrity in fulfilling Breast Cancer Alliance's responsibilities and complying with all applicable laws and regulations. This policy is intended to encourage and enable good faith reporting of Wrongful Conduct and to protect individuals from retaliation who make such reports.

Purpose

This policy creates a mechanism for officers, directors and employees to report Wrongful Conduct. Wrongful Conduct is defined as a violation of applicable law or regulations or material violations of Breast Cancer Alliance's operating policies ("**Wrongful Conduct**").

Examples of Wrongful Conduct that this policy is intended to address include, but are not limited to:

- Forgery or alteration of documents;
- Fraudulent financial reporting;
- Unauthorized alteration or manipulation of computer files;
- Non-compliance with the Breast Cancer Alliance's legal responsibilities;
- Misappropriation of funds or theft of property of the Breast Cancer Alliance; or
- Material violations of conflict of interest, record retention or other Breast Cancer Alliance policies, including the Employee Handbook.

No officer, director or employee (a "**Reporting Person**") who in good faith reports Wrongful Conduct will suffer retaliation, harassment or adverse employment consequences.

Reporting

A Reporting Person may report Wrongful Conduct directly to the Executive Director, any director-level employee, any officer or any member of the Executive Committee of the Board of the Breast Cancer Alliance. Such persons are required to report immediately any allegation of Wrongful Conduct to the President of the Board of Directors, in his capacity as Chairperson of the Executive Committee, who has specific and exclusive authority to investigate all reported violations. If the Reporting Person believes that the concerns reported will not be fairly considered, the Reporting Person may report Wrongful Conduct directly to any member of the Board of Directors.

Breast Cancer Alliance will make every effort to treat the Reporting Person's identity with confidentiality, with the understanding that details of the allegations concerning the Wrongful Conduct may need to be shared with others in order to conduct a comprehensive investigation.

Anonymous reports, while accepted, impact the Breast Cancer Alliance's ability to conduct an investigation. Thus, Reporting Persons are encouraged to disclose their identity to increase the credibility of the report and to enable the Breast Cancer Alliance to investigate the matter thoroughly.

The Reporting Person will not be expected to prove the truth of his or her allegations of Wrongful Conduct, but he or she should be prepared to demonstrate that the allegations are made in good faith and to submit whatever evidence is available to support the allegations. Reports of unfounded allegations of Wrongful Conduct that are demonstrated to have been made recklessly, maliciously or with the knowledge that the allegations were false may lead to disciplinary action, up to and including termination.

Response

The President of the Board of Directors, in his capacity as Chairperson of the Executive Committee, is responsible to supervise and direct a prompt investigation. The action taken will be dependent on the nature of the concern. The President of the Board of Directors, in his capacity as Chairperson of the Executive Committee, shall provide a report of the conclusions of the investigation and a recommendation for the disciplinary and corrective action to be taken, if any, to the Board of Directors, who will determine by majority vote whether to adopt such recommendation or adopt an alternative action.

Due to the important yet sensitive nature of the suspected violations, effective professional follow-up is critical. Reporting Persons and officers who become aware of Wrongful Conduct, while appropriately concerned about "getting to the bottom" of such issues, should not in any circumstances perform any investigative or other follow-up steps on their own. Accordingly, a Reporting Person or officer who becomes aware of Wrongful Misconduct:

- Should not contact the person suspected to further investigate the matter or demand restitution;
- Should not discuss the case with attorneys, the media, or anyone outside the investigation; and
- Should not report the case to an authorized law enforcement officer without first discussing the case with the President of the Board of Directors, in his capacity as Chairperson of the Executive Committee.

Retaliation Prohibited

No Reporting Person who reports Wrongful Conduct in good faith under this policy shall suffer threats, abuse, harassment, retaliation, discrimination or any other or adverse employment consequence. A person within the Breast Cancer Alliance who does retaliate against a Reporting Person is subject to discipline up to, and including, termination of employment.

Any Reporting Person who believes he or she has been retaliated against should report it to the President of the Board of Directors, Executive Director or other member of the Board of Directors.

Certification of Compliance

When an individual is first appointed or employed, he or she must complete and deliver to the Breast Cancer Alliance a certificate in the form specified by the Breast Cancer Alliance , which, initially, will be as attached to this policy as **Annex A**.

Violations of this Policy

Violations of this policy will be subject to such disciplinary and corrective action as the Board of Directors deems appropriate.

Periodic Reviews

The Board of Directors shall review this policy periodically to ensure that it continues to satisfy the obligations of the Breast Cancer Alliance . Any changes to the policy will be communicated timely to all employees.