	<b>Whistleblower Policy</b>	
	Policy Document #: POL-2002	Version #: 2.0
	Effective Date: <i>04 DEC 2020</i>	

## I. APPLICABLE PERSONS

- Board of Directors
- Employees
- Committee Members
- Consultants
- Volunteers

## II. PURPOSE

The whistleblower policy is intended to provide a mechanism for the reporting of violations of the Institute for Advanced Clinical Trials (I-ACT) for Children (the “Organization”) Code of Conduct and Ethics or suspected violations of law or regulations that govern the Organization’s operations.

## III. POLICY STATEMENT

I-ACT for Children requires directors and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of I-ACT for Children, directors and employees must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

This Whistleblower Policy: (1) encourages staff and volunteers to come forward with credible information on illegal practices or serious violations of adopted policies of the organization; (2) specifies that I-ACT for Children will protect the person from retaliation; and (3) identifies where such information can be reported.

## IV. DEFINITIONS

N/A


## V. PROCEDURES

### A. Reporting

- i. Any Applicable Person who has engaged in, or who reasonably suspects any other Applicable Person of engaging in, any violation of the law, regulations, ethical rules or any policy of the Organization must report such activity as soon as possible. As stated in the Code of Conduct and Ethics, such activity may include, but is not limited to, financial wrongdoing (including circumvention of internal controls or violation of the accounting policies of the Organization), fraud, harassment, or any other illegal or unethical conduct.
- ii. Reports may be made by writing to the CEO, Chairman of the Board ([ed.connor@iactc.org](mailto:ed.connor@iactc.org)) or Human Resources ([HR@iactc.org](mailto:HR@iactc.org)). Alternatively, employees may make such reports to their supervisor, where appropriate. Any person receiving such a report must refer it to the CEO or to the Chairman of the Board as soon as possible. Reports may be made anonymously.

### B. Investigation

The Chairman of the Board and/or CEO, where appropriate, is accountable for ensuring that all

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complaints about unethical or illegal conduct are investigated and resolved. All reports will be investigated and handled in a timely and sensitive manner. Confidentiality will be maintained throughout the investigation to the extent reasonable and practicable under the circumstances, and consistent with appropriate investigative and corrective action.

## **VI. ACCOUNTING AND AUDITING MATTERS**

The Chairman of the Board or CEO shall immediately notify the Chair of the Audit and Compensation Committee of any concerns or complaint regarding corporate accounting practices, internal controls or auditing and work with the committee until the matter is resolved. Chair of the Audit and Compensation Committee is responsible for communicating any such concerns to the Chairman of the Board and/or CEO.

- No Retaliation

There will be no adverse employment action or other retaliation against any employee who reports a suspected violation or assists in an investigation, except in those instances where the Organization determines that a false report was made with intent to harm the Organization or an individual within the Organization.

Intimidation, coercion, threats or discrimination against any individual who reports suspected wrongdoing is prohibited and will be subject to appropriate disciplinary action, which may include termination.

## **VII. RESPONSIBILITY TO COMPLY & REPORT POTENTIAL MISCONDUCT**

Compliance with this policy is mandatory.

Any person who learns of a potential breach of applicable laws, regulations, this Policy or any other policy is required to report his/her suspicion as soon as possible in accordance with the I-ACT for Children Code of Business Conduct and Ethics (POL-2001).

Breach and noncompliance must be reported to the Vice President, Legal and Compliance and/or the Chief Executive Officer, who will determine the action to be taken.


## **VIII. POLICY REVIEW**

This Policy will be reviewed and updated (as needed) on a biennial basis unless changes in laws or I-ACT for Children's business needs require and indicate otherwise.

Any substantive revisions to this policy will require all persons to re-review & sign this Policy and accompanying acknowledgement statement. Revisions that are strictly administrative (i.e. grammar and formatting) do not require re-review or completion of the accompanying acknowledgement statement.


## **IX. REFERENCES**

- POL 2001, Code of Business Conduct and Ethics Policy

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	Effective Date: <i>04 DEC 2020</i>	

## X. REVISION HISTORY

Version Number	Revision Date	Summary of Changes
2.0	09 SEP 2020	Updated policy to new template, added Policy Statement, expanded Applicable Persons to include Committee Members, Consultants and Volunteers, changed references from “President/CEO” to “Chairman of the Board and/or CEO.”
1.0	17 APR 2018	Initial version of Policy

	<b>Whistle Blower Policy Acknowledgement</b>	
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**POLICY ACKNOWLEDGEMENT STATEMENT**

I, \_\_\_\_\_ hereby certify and acknowledge that I have read and understand  
(Print Name)

*POL-2002, Whistleblower Policy* in full and how it applies to me in my role at I-ACT for Children.

**Signature & Date:** \_\_\_\_\_

**Title:** \_\_\_\_\_

<b>POLICY APPROVAL PAGE</b>			
Title: <b>Whistle Blower Policy</b>			
POL-2002	Version No.: 2.0	Effective Date: <i>04 DEC 2020</i>	
Total Number of Pages in Approved Policy Excluding Approval Page			4

Indicate whether Board of Directors approval was required (check one):

No

Yes – Signature by the Chief Executive Officer indicates this Policy has been reviewed and approved by the I-ACT for Children Board of Directors

APPROVALS	
Department/Function	Signature and Date
Amy Lynch VP, Legal and Compliance <i>Author</i>	DocuSigned by: <i>Amy Lynch</i> 17-Nov-2020   3:59 PM EST
Laura Gordon <i>Chief Executive Officer</i>	DocuSigned by: <i>Laura Gordon</i> 17-Nov-2020   2:18 PM PST
Melissa Riviuccio QA Manager <i>Quality Approval</i>	DocuSigned by: <i>Melissa Riviuccio</i> 18-Nov-2020   7:52 AM EST

## Certificate Of Completion

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Source Envelope:	
Document Pages: 5	Signatures: 3
Certificate Pages: 5	Initials: 0
AutoNav: Enabled	Envelope Originator:
Envelopeld Stamping: Enabled	Melissa Riviuccio
Time Zone: (UTC-05:00) Eastern Time (US & Canada)	9211 Corporate Blvd Ste 260
	Rockville, MD 20850
	melissa.riviuccio@iactc.org
	IP Address: 108.31.218.211

## Record Tracking

Status: Original 17-Nov-2020   15:54	Holder: Melissa Riviuccio melissa.riviuccio@iactc.org	Location: DocuSign
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## Signer Events

Amy Lynch  
amy.lynch@iactc.org  
I-ACT for Children  
Security Level: Email, Account Authentication (None)

## Signature

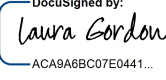
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### Electronic Record and Signature Disclosure: Not Offered via DocuSign

Laura Gordon  
laura.gordon@iactc.org  
CEO  
Security Level: Email, Account Authentication (None)

DocuSigned by:  
  
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Signature Adoption: Pre-selected Style  
Using IP Address: 69.143.80.199

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Signed: 17-Nov-2020 | 17:18

### Electronic Record and Signature Disclosure: Accepted: 06-May-2020 | 13:29 ID: b4357499-fe02-46c3-a19a-6c4c61ce14fe

Melissa Riviuccio  
melissa.riviuccio@iactc.org  
I-ACT for Children  
Security Level: Email, Account Authentication (None)

DocuSigned by:  
  
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Signature Adoption: Pre-selected Style  
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You may contact us to let us know of your changes as to how we may contact you electronically, to request paper copies of certain information from us, and to withdraw your prior consent to receive notices and disclosures electronically as follows:

To contact us by email send messages to: [karen.king@iactc.org](mailto:karen.king@iactc.org)

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To let us know of a change in your email address where we should send notices and disclosures electronically to you, you must send an email message to us at [karen.king@iactc.org](mailto:karen.king@iactc.org) and in the body of such request you must state: your previous email address, your new email address. We do not require any other information from you to change your email address.

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- ii. send us an email to karen.king@iactc.org and in the body of such request you must state your email, full name, mailing address, and telephone number. We do not need any other information from you to withdraw consent.. The consequences of your withdrawing consent for online documents will be that transactions may take a longer time to process..

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