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) or Human Resources (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
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
X. REVISION HISTORY

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<th>Version Number</th>
<th>Revision Date</th>
<th>Summary of Changes</th>
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<td>2.0</td>
<td>09 SEP 2020</td>
<td>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.”</td>
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<td>1.0</td>
<td>17 APR 2018</td>
<td>Initial version of Policy</td>
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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: __________________________
Title: Whistle Blower Policy

POL-2002  Version No.: 2.0  Effective Date: 04 DEC 2020

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

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<tr>
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<tr>
<td>Laura Gordon, Chief Executive Officer</td>
<td>17-Nov-2020</td>
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<tr>
<td>Melissa Rivieccio, QA Manager, Quality Approval</td>
<td>18-Nov-2020</td>
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Subject: Please DocuSign: POL-2002 Whistleblower Policy v.2.0
Source Envelope:
Document Pages: 5  Signature Pages: 5  Envelope Originator:
Certificate Pages: 5  Initials: 0  Melissa Rivieccio
AutoNav: Enabled  Envelopield Stamping: Enabled
Time Zone: (UTC-05:00) Eastern Time (US & Canada)
9211 Corporate Blvd Ste 260  Rockville, MD  20850
Email: melissa.rivieccio@iactc.org

Record Tracking
Status: Original  Holder: Melissa Rivieccio  Location: DocuSign
17-Nov-2020 | 15:54  melissa.rivieccio@iactc.org

Signer Events
Signature  Timestamp
amy.lynch@iactc.org  Signature Adoption: Pre-selected Style  Using IP Address: 100.36.249.174
I-ACT for Children
Security Level: Email, Account Authentication (None)

laura.gordon@iactc.org  Signature Adoption: Pre-selected Style  Using IP Address: 69.143.80.199
CEO
Security Level: Email, Account Authentication (None)

melissa.rivieccio@iactc.org  Signature Adoption: Pre-selected Style  Using IP Address: 108.31.218.211
I-ACT for Children
Security Level: Email, Account Authentication (None)

Electronic Record and Signature Disclosure:
Not Offered via DocuSign

In Person Signer Events
Signature  Timestamp

Editor Delivery Events
Status  Timestamp

Agent Delivery Events
Status  Timestamp

Intermediary Delivery Events
Status  Timestamp

Certified Delivery Events
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ELECTRONIC RECORD AND SIGNATURE DISCLOSURE

From time to time, I-ACT for Children (we, us or Company) may be required by law to provide to you certain written notices or disclosures. Described below are the terms and conditions for providing to you such notices and disclosures electronically through the DocuSign system. Please read the information below carefully and thoroughly, and if you can access this information electronically to your satisfaction and agree to this Electronic Record and Signature Disclosure (ERSD), please confirm your agreement by selecting the check-box next to ‘I agree to use electronic records and signatures’ before clicking ‘CONTINUE’ within the DocuSign system.

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At any time, you may request from us a paper copy of any record provided or made available electronically to you by us. You will have the ability to download and print documents we send to you through the DocuSign system during and immediately after the signing session and, if you elect to create a DocuSign account, you may access the documents for a limited period of time (usually 30 days) after such documents are first sent to you. After such time, if you wish for us to send you paper copies of any such documents from our office to you, you will be charged a $0.00 per-page fee. You may request delivery of such paper copies from us by following the procedure described below.

**Withdrawing your consent**

If you decide to receive notices and disclosures from us electronically, you may at any time change your mind and tell us that thereafter you want to receive required notices and disclosures only in paper format. How you must inform us of your decision to receive future notices and disclosure in paper format and withdraw your consent to receive notices and disclosures electronically is described below.

**Consequences of changing your mind**

If you elect to receive required notices and disclosures only in paper format, it will slow the speed at which we can complete certain steps in transactions with you and delivering services to you because we will need first to send the required notices or disclosures to you in paper format, and then wait until we receive back from you your acknowledgment of your receipt of such paper notices or disclosures. Further, you will no longer be able to use the DocuSign system to receive required notices and consents electronically from us or to sign electronically documents from us.

**All notices and disclosures will be sent to you electronically**
Unless you tell us otherwise in accordance with the procedures described herein, we will provide electronically to you through the DocuSign system all required notices, disclosures, authorizations, acknowledgements, and other documents that are required to be provided or made available to you during the course of our relationship with you. To reduce the chance of you inadvertently not receiving any notice or disclosure, we prefer to provide all of the required notices and disclosures to you by the same method and to the same address that you have given us. Thus, you can receive all the disclosures and notices electronically or in paper format through the paper mail delivery system. If you do not agree with this process, please let us know as described below. Please also see the paragraph immediately above that describes the consequences of your electing not to receive delivery of the notices and disclosures electronically from us.

How to contact I-ACT for Children:

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

To advise I-ACT for Children of your new email address

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 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.
If you created a DocuSign account, you may update it with your new email address through your account preferences.

To request paper copies from I-ACT for Children

To request delivery from us of paper copies of the notices and disclosures previously provided by us to you electronically, you must send us an email to karen.king@iactc.org and in the body of such request you must state your email address, full name, mailing address, and telephone number. We will bill you for any fees at that time, if any.

To withdraw your consent with I-ACT for Children

To inform us that you no longer wish to receive future notices and disclosures in electronic format you may:
i. decline to sign a document from within your signing session, and on the subsequent page, select the check-box indicating you wish to withdraw your consent, or you may;

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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**Acknowledging your access and consent to receive and sign documents electronically**

To confirm to us that you can access this information electronically, which will be similar to other electronic notices and disclosures that we will provide to you, please confirm that you have read this ERSD, and (i) that you are able to print on paper or electronically save this ERSD for your future reference and access; or (ii) that you are able to email this ERSD to an email address where you will be able to print on paper or save it for your future reference and access. Further, if you consent to receiving notices and disclosures exclusively in electronic format as described herein, then select the check-box next to ‘I agree to use electronic records and signatures’ before clicking ‘CONTINUE’ within the DocuSign system.

By selecting the check-box next to ‘I agree to use electronic records and signatures’, you confirm that:

- You can access and read this Electronic Record and Signature Disclosure; and
- You can print on paper this Electronic Record and Signature Disclosure, or save or send this Electronic Record and Disclosure to a location where you can print it, for future reference and access; and
- Until or unless you notify I-ACT for Children as described above, you consent to receive exclusively through electronic means all notices, disclosures, authorizations, acknowledgements, and other documents that are required to be provided or made available to you by I-ACT for Children during the course of your relationship with I-ACT for Children.