



**POLICY ON REPORTING AND INVESTIGATING ALLEGATIONS
OF SUSPECTED IMPROPER ACTIVITIES
(WHISTLEBLOWER POLICY)**

Preamble

The Epilepsy Foundation has a responsibility for the stewardship of its resources and the public and private support that enables it to pursue its mission. The Foundation is committed to compliance with the laws and regulations to which it is subject and to promulgating Foundation policies and procedures to interpret and apply these laws and regulations in the Foundation setting. Laws, regulations, policies and procedures strengthen and promote ethical practices and ethical treatment of those in the epilepsy community and those who conduct business with the Foundation.

General

The Epilepsy Foundation's Code of Ethics and the Foundation's Conflict of Interest Policy require board members, employees, and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities to the Foundation. We must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

Each board member, employee and volunteers is responsible for promptly reporting to the Foundation any circumstances that such person believes in good faith may constitute a violation of the Code of Ethics or any other Foundation policy, including the policies set forth in the Human Resources Manual, or applicable law, regulations or rules, in accordance with this Policy.

No Retaliation

No Board member, volunteer, employee or others interested in the Foundation's activities, who in good faith reports a violation of the Code shall suffer harassment, retaliation or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment or affiliation with the Foundation.

**WHO DO I CONTACT
FOR GUIDANCE OR TO REPORT CONCERNS?**

If you believe a situation may involve or lead to a violation of the Code of Ethics or any other Foundation policy, including the policies set forth in the Human Resources Manual, you have an affirmative duty to seek guidance and report such concerns.

- Seek guidance from a responsible supervisor or other appropriate internal authority (for example, the Human Resources Department).
- Disclose concerns or violations to a supervisor, the Human Resources Department, the Chair of the Audit Committee or the Chief Operating Officer.

Reporting Concerns

This policy is meant to be construed as an open-door policy and suggests that employees share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an employee's supervisor is in the best position to address an area of concern. However, if an individual is not comfortable speaking to his or her supervisor, that individual should speak to someone in the Human Resources Department, the Chief Operating Officer or the Chief Executive Officer. Board members and volunteers may report concerns to the Chief Operating Officer or the Chair of the Audit Committee. All reported concerns shall be reviewed and investigated by the Chief Operating Officer. It is understood that in circumstances of a potential conflict of interest or reported concerns relating to the Chair of the Audit Committee or the Chief Operating Officer, the investigation may be undertaken under the direction of the party not subject to potential conflict. If the concern relates to accounting, audit or financial matters, such concern may be raised with the Chair of the Audit Committee.

Investigating Concerns

The Chief Operating Officer and the Chair of the Audit Committee are responsible for investigating and resolving all reported complaints and allegations concerning violations of the Code of Ethics, Conflict of Interest Policy or any other Foundation policy, including the policies set forth in the Human Resources Manual, and, at his or her discretion, shall advise the Chair of the Board, the Executive Committee and/or the Chair of the Audit Committee of the investigation. The Chief Operating Officer is required to report to the Audit Committee and the Board as appropriate at least annually on all compliance activity. The Chief Operating Officer or Chair of the Audit Committee may use outside counsel and related assistance as necessary to carry out the investigation in a complete and unbiased manner.

Accounting and Auditing Matters

The Audit Committee of the Board of Directors shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. Anyone who receives a report of an accounting, audit or financial concern shall immediately notify the Audit Committee of any such complaint and work with the Committee until the matter is resolved.

Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation of the Code or Conflict of Interest Policy must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Foundation's Code or policies. 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 and may be considered a violation of the Code of Ethics.

Confidentiality

Violations or suspected violations may be submitted on an anonymous or confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Violations

Any manager who learns of a complaint that is filed shall share it with the Chief Operating Officer or the Chair of the Audit Committee, who will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated, and appropriate corrective action will be taken, if warranted, by the investigation.