

THE SARAH RALSTON FOUNDATION WHISTLEBLOWER POLICY

The Sarah Ralston Foundation is committed to lawful and ethical behavior in all of its activities and requires that its directors, officers, employees and consultants (collectively, "Corporation Persons") conduct themselves in a manner that complies with all applicable laws and Corporation policies. Set forth below is the Corporation's policy with respect to reporting good faith concerns about the legality or propriety of actions or plans taken by Corporation Persons.

Reporting Concerns

Any Corporation Person who has a good faith concern regarding the legality or propriety of any action taken by, or contemplated to be taken by, a Corporation Person or otherwise by the Corporation, or a good faith belief that action needs to be taken for the Corporation to be in compliance with laws, policies or ethical standards, should promptly advise the Corporation's Executive Director who is responsible for the administration of this Whistleblower Policy (the "Compliance Officer"). If the Compliance Officer is unresponsive or is the subject of the concern, the person should report the concern to the Corporation's Board President or to the Chairman of the Board's Finance Committee. If the Compliance Officer is the subject of the reported concern, the Finance Committee will designate another person to serve as the Compliance Officer with respect to that report.

Reports can be made verbally or in writing, in person or anonymously. To the extent possible, reports should include documentation supporting the concern. Reports should be as detailed as possible in order to facilitate investigation.

Investigation

The Corporation will investigate these reports with care. If as a result of the investigation the Corporation discovers a problem, it will promptly alert the Board President and take corrective action as it deems necessary.

Confidentiality

The Corporation will protect the identity of the person reporting a concern to the greatest extent practicable given the needs to conduct a thorough investigation and to take any necessary corrective action. Accordingly, the Corporation cannot promise complete confidentiality, but it will act as discreetly as reasonably possible.

No Retaliation

The Corporation will not intimidate, harass, discharge, threaten, or discriminate or retaliate against a Corporation Person in any manner for his or her reporting in good faith what he or she perceives to be a wrongdoing, violation of law or policy, or other unethical or illegal conduct or for assisting in the investigation of such a report. The Corporation will impose disciplinary measures, up to and including termination or removal, against anyone who threatens or retaliates against a Corporation Person who makes such a good faith report or assists in the investigation of same.

Illustrative Types of Concerns

The following is a non-exhaustive list of the kinds of improprieties that should be reported:

- supplying false or misleading information on the Corporation's financial or other public documents, including its tax return (990-PF);
- providing false information to or withholding material information from the Corporation's auditors or Directors;
- embezzlement, self-dealing, private inurement (i.e., Corporation earnings inuring to the benefit of an individual) and private benefit (i.e., Corporation assets being used for personal gain or benefit);
- violations of the Corporation's Conflicts of Interest Policy;
- payment for services or goods that are not rendered or delivered; and
- facilitating or concealing any of the above or similar actions.

Disclosure to and Deliberation by the Finance Committee

In addition to prompt notification to the Chairman of the Finance Committee following an investigation where a problem is found, the Compliance Officer will report periodically to the Finance Committee with a summary of the reports received pursuant to this Whistleblower Policy and the disposition of those reports. The person who is the subject of the whistleblower complaint may not be present at or participate in any deliberations or vote relating to that complaint, except that, upon request of the Finance Committee, such person may appear at a meeting to present background information or answer questions prior to the start of deliberations and voting.

Legal Resource

The Foundation's general counsel may be utilized to investigate a complaint and/or to assist in deliberation when the Finance Committee requests guidance.

Please contact:

Cheshire Law Group – Nonprofit Law
5275 Germantown Avenue
Philadelphia, PA 19144
267-331-4157

Distribution

A copy of this Whistleblower Policy will be distributed to all Corporation Persons and will be posted on the Corporation's website.

The Corporation reserves the right to amend and/or supplement this Whistleblower Policy at any time.

Adopted and approved on: August 15, 2022