

## PAUL G. ALLEN FAMILY FOUNDATION WHISTLEBLOWER POLICY

**Purpose.** The Paul G. Allen Family Foundation (the “Foundation”) is committed to ensuring that its operations are conducted according to the highest standards of integrity and in facilitating open and honest communication in all matters regarding governance, finances and compliance with laws. The purpose of this Whistleblower Policy (this “Policy”) is to prevent and detect improper activities, encourage reporting of good faith complaints, and protect reporting individuals from retaliatory action. The Foundation will investigate all good faith reports of misconduct including complaints of fraudulent or dishonest use or misuse of the Foundation’s resources or property, discrimination, and violation of laws or policy.

**Reporting Misconduct.** Any director, officer, consultant, service provider, volunteer, grantee or other member of the Foundation community that is concerned about possible misconduct related to Foundation assets or activities (each a “reporting individual”) is encouraged to promptly report such possible misconduct as set forth in this Policy. The types of activities and misconduct that should be reported include but are not limited to:

- Theft
- Forgery or alteration of documents
- Unauthorized alteration or manipulation of computer files
- Fraudulent financial reporting
- Pursuit of a benefit or advantage in violation of the Foundation’s conflict of interest policy
- Misappropriation or misuse of the Foundation’s resources, such as funds, supplies, or other assets
- Material violation of any Foundation policy or the Foundation Grantee [Code of Conduct](#)
- Discrimination based on race, gender, sexual orientation, disability, ancestry or other status protected by law or policy
- Authorizing or receiving compensation for goods not received or services not performed
- Corruption, bribery or other illegal activities

**No Retaliation.** The Foundation will use best efforts to protect any reporting individual against retaliation. Any Foundation representative who retaliates against a reporting individual who made a report in good faith will

be subject to possible disciplinary action. Any reporting individual who believes that they have been retaliated against should report such action to the Foundation as set forth in this Policy.

**Confidentiality.** While the Foundation cannot guarantee confidentiality of the identity of the reporting individual, it will keep the reporting individual’s identity confidential to the greatest extent practical given the need to conduct a complete investigation and take necessary corrective action.

### **Rights and Responsibilities of Reporting Individuals.**

Reporting individuals are responsible for candidly sharing all relevant information regarding the suspected misconduct. Reports can be made verbally or in writing as set forth below. To the extent possible, reports should include documentation supporting the concern. Reports should be as detailed as possible in order to facilitate a complete investigation. Reporting individuals should be cautious to avoid baseless allegations, and it is improper for any person to intentionally make baseless allegations against the Foundation or its representatives. Reporting individuals and any person who is not a reporting individual, but who is interviewed as part of an investigation, should refrain from contacting any persons suspected of misconduct in order to investigate themselves, and from discussing any investigation around the report with those not connected to the investigation or with the press. Press inquiries should be referred to the Foundation media team: [press@pgafamilyfoundation.org](mailto:press@pgafamilyfoundation.org).

**Process to Report.** A reporting individual under this Policy may submit a report via [EthicsPoint](#), a third-party reporting service authorized by the Foundation to receive such reports. Reports may also be made to the Foundation’s Vice President and Secretary, Alison G. Ivey, who is responsible for the administration of this Policy: [alisoni@vulcan.com](mailto:alisoni@vulcan.com).

### **Maintenance of Records; Distribution of Policy.**

The Foundation will maintain files of investigations undertaken based on reports under this Policy. Access to the investigation file will be limited to the investigation team and the Foundation counsel. This Policy will be posted on the Foundation’s website and made available to Foundation officers, directors, service providers and agents.