

Chacruna's Whistleblower Protection Policy

Chacruna requires directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the Chacruna, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that Chacruna can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees and volunteers to report concerns about violations of Chacruna's code of ethics or suspected violations of law or regulations that govern Chacruna's operations.

No Retaliation

It is contrary to the values of Chacruna for anyone to retaliate against any board member, officer, employee or volunteer who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of Chacruna. An employee or Board Member who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment or removal from the Board.

Reporting Procedure

Chacruna has an open door policy and suggests that employees share their questions, concerns, suggestions or complaints with their supervisor or a member of the Board of Directors. If you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with the legal General Counsel of Chacruna. Supervisors and managers are required to report complaints or concerns about suspected ethical and legal violations in writing to the legal General Counsel of Chacruna, who has the responsibility to investigate all reported complaints. Employees with concerns or complaints may also submit their concerns in writing directly to their supervisor or the Executive Director or the legal General Counsel of Chacruna. Chacruna's legal General Counsel is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. Legal General Counsel will advise the Executive Director and/or the Board of Directors of all complaints and their resolution and will report at least annually to Board of Directors on compliance activity relating to accounting or alleged financial improprieties.

Accounting and Auditing Matters

Chacruna's legal General Counsel shall immediately notify the Board of Directors of any concerns or complaint regarding corporate accounting practices, internal controls or auditing and work with the Board of Directors until the matter is resolved.

Acting in Good Faith

Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. 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.

Confidentiality

Violations or suspected violations may be submitted on a 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

Chacruna’s legal General Counsel will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

This policy was adopted by a vote of the Board of Directors on the _____ day of _____, 2019.

Chair, Board of Directors of Chacruna