

WHISTLEBLOWER PROTECTION POLICY

The Jacques Pépin Foundation

The Jacques Pépin Foundation (hereinafter, “the Foundation”) 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 Foundation, 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 board members, officers, employees, volunteers, and others to raise serious concerns internally so that the Foundation 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 the Foundation’s code of ethics or suspected violations of law or regulations that govern the Foundation.

No Retaliation

It is contrary to the values of the Foundation 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 the Foundation. A board member or officer or 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 removal from the board.

Reporting Procedure

The Foundation has an open door policy and suggests that board members, officers, employees and volunteers share their questions, concerns, suggestions or complaints with the President or Vice President. If you are not comfortable speaking with these officers or if you are not satisfied with their response, you are encouraged to speak with any other board member or director. Anyone receiving a complaint or concern about suspected ethical and legal violations shall report the complaint or concern in writing to the Foundation’s Compliance Officer, who has the responsibility to investigate all reported complaints.

Compliance Officer

The Foundation’s Compliance Officer is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Compliance Officer will advise the Board of Directors of all complaints and their resolution and will report at least annually to the Treasurer on compliance activity relating to accounting or alleged financial improprieties.

Accounting and Auditing Matters

The Foundation's Treasurer shall immediately notify the Audit Committee/Finance Committee of any concerns or complaint regarding corporate accounting practice, internal controls or auditing and work with the committee until the matter is resolved. If there is no audit committee or Finance Committee, the treasurer shall notify the President and Vice President.

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

The Foundation's Compliance Officer 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.

Compliance Officer: The initial individual designated as Compliance Officer with the Board's adoption of this policy shall be _____ and the Board shall replace or name a successor compliance officer as it deems appropriate.

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