

THE DIAMOND BLACKFAN ANEMIA FOUNDATION, INC.

WHISTLEBLOWER PROTECTION POLICY

Introduction

The Diamond Blackfan Anemia Foundation, Inc. (“DBAF”) is deeply committed not only to complying with all applicable laws and regulations, but also to conducting our business consistent with DBAF’s core values

Policy Detail

It is every director’s, key volunteer’s and employee’s duty to observe high standards of business and personal ethics in conducting their duties and responsibilities. Employees and representatives of DBAF must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations. The following discusses how employees should use this policy and the safeguards the DBAF provides them.

Questionable Conduct Defined

The Policy is designed to address situations in which an individual suspects unlawful or unethical conduct. Examples include, without limitation, fraud, theft, embezzlement, accounting or auditing irregularities, misrepresentations to customers or third-parties, bribery, kickbacks, misuse of DBAF’s resources or assets and conflicts of interest. If you have any question regarding what falls under the area of questionable conduct, please contact DBAF Executive Director Dawn Baumgardner or DBAF Board Member Rebecca DeGross.

Anti-Retaliation & Confidentiality

DBAF strictly prohibits retaliation against any individual who, in good faith, (i) reports actual or suspected violations of the law or otherwise brings inappropriate conduct to the company’s attention; (ii) prevents unlawful practices; (iii) participates in an investigation, proceeding or hearing; or (iv) cooperates with any government agency.

Any individual who has made a report of questionable conduct and believes he or she has been subjected to retaliation of any kind by any DBAF employee is directed to immediately report it to DBAF Executive Director Dawn Baumgardner or DBAF Board Member Rebecca DeGross..

DBAF will, to the greatest extent practicable, keep reports of unlawful or unethical conduct confidential.

Any employee who engages in any retaliatory action is subject to disciplinary action, up to and including termination of employment.

Complaint Process

Who Can File a Complaint

All DBAF employees, directors and volunteers — regardless of title, tenure at the organization, or any other factor—are expected to promptly report allegations of questionable business conduct.

Anonymous & Non-Anonymous Reporting Channels

Individuals may lodge a complaint to either DBAF Executive Director Dawn Baumgardner or DBAF Board Member Rebecca DeGroff. Individuals are not required to identify themselves in connection with their complaints, and DBAF takes anonymous reports as seriously as non-anonymous reports.

Investigation Process

DBAF will investigate all complaints to determine the facts and resolution appropriate under the circumstances. Individuals who raised complaints will be notified when the investigation has begun and when it is concluded. It is important to recognize, however, that it often is impracticable to convey details relating to investigations and/or subsequent remedial measures to complainants.

Responding To Potential Violations

Reporting suspected violations of law and unethical conduct is not just encouraged — it is a requirement of every DBAF employee and director. Although each situation is considered on a case-by-case basis, DBAF consistently undertakes appropriate disciplinary action to address inappropriate conduct and to deter future violations. In particular, discipline up to and including termination of employment may be taken for: authorizing or participating in a violation; refusing to cooperate with the investigation of a suspected violation; retaliating against an individual who reported in good faith a suspected violation; and failing to complete the training referenced in the Compliance Program.