

PEDIATRIC LOW GRADE ASTROCYTOMA FOUNDATION, INC.

WHISTLEBLOWER PROTECTION POLICY

The Pediatric Low Grade Astrocytoma Foundation, Inc. (hereinafter referred to as “PLGA, Inc.”) 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 PLGA, Inc., we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations. It is the intent of PLGA, Inc. to fully comply with and adhere to all Massachusetts and federal laws regarding so-called “whistleblowers,” including the provisions set forth in Massachusetts General Laws, Chapter 149, Section 185.

Reporting Responsibility

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that PLGA, Inc. 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 or suspected violations of law or regulations that govern PLGA, Inc.’s operations. Nothing in this policy shall be deemed to diminish the rights, privileges or remedies of any employee under any other federal or state law or regulation, or under any collective bargaining agreement or employment contract; except that the institution of a private action in accordance with M.G.L. c. 149, § 185(d), shall be deemed a waiver by the plaintiff of the rights and remedies available to him, for the actions of PLGA, Inc., under any other contract, collective bargaining agreement, state law, rule or regulation, or under the common law.

No Retaliation

A. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. It is contrary to the values of PLGA, Inc. for anyone to retaliate against any board member, officer, employee or volunteer who in good faith:

- (1) Discloses, or threatens to disclose to a supervisor or to a public body an activity, policy or practice of PLGA, Inc., or of another employer with whom PLGA, Inc. has a business relationship, that the employee reasonably believes is in violation of a law, or a rule or regulation promulgated pursuant to law, or which the employee reasonably believes poses a risk to public health, safety or the environment;
- (2) Provides information to, or testifies before, any public body conducting an investigation, hearing or inquiry into any violation of law, or a rule or regulation promulgated pursuant to law, or activity, policy or practice which the employee reasonably believes poses a risk to public health, safety or the environment by PLGA, Inc., or by another employer with whom PLGA, Inc. has a business relationship; or
- (3) Objects to, or refuses to participate in any activity, policy or practice which the employee reasonably believes is in violation of a law, or a rule or regulation promulgated pursuant to law, or which the employee reasonably believes poses a risk to public health, safety or

the environment.

- B. Except as provided in M.G.L. c. 149, § 185, the protection against retaliatory action shall not apply to an employee who makes a disclosure to a public body unless the employee has brought the activity, policy or practice in violation of a law, or a rule or regulation promulgated pursuant to law, or which the employee reasonably believes poses a risk to public health, safety or the environment, to the attention of a supervisor of the employee by written notice and has afforded PLGA, Inc. a reasonable opportunity to correct the activity, policy or practice.

Notice

PLGA, Inc. shall conspicuously display notices reasonably designed to inform its employees of their protection and obligations under this section, and use other appropriate means to keep its employees so informed. Each notice posted pursuant to this subsection shall include the name of the person or persons PLGA, Inc. has designated to receive written notifications pursuant to this policy.

Reporting Procedure

PLGA, Inc. has an open door policy and suggests that employees share their questions, concerns, suggestions or complaints with their supervisor. 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 a member of the Board of Directors. Supervisors and members of the Board of Directors are required to report complaints or concerns about suspected ethical and legal violations in writing to PLGA, Inc.'s Compliance Officer, **Michael A. Bass**, a member of the Board of Directors, who has the responsibility to investigate all reported complaints.

Compliance Officer

PLGA, Inc.'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 President and/or 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. The role of Compliance Officer may be served by any member of the Board of Directors or officer of PLGA, Inc. and his or her appointment shall be approved by majority vote of the Board of Directors.

Accounting and Auditing Matters

PLGA, Inc.'s Compliance Officer 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 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

PLGA, Inc.'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: Michael A. Bass
Member of the Board of Directors of PLGA, Inc.

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