



WHISTLEBLOWER POLICY

Introduction

In 2005, the Board of Directors of the Lucile Packard Foundation for Children's Health adopted the Statement of Values and Code of Ethics, requiring all staff, board members and volunteers 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. Set forth below is the Foundation's policy with respect to reporting good faith concerns about the legality or propriety of Foundation actions or plans.

Reporting of Concerns or Complaints

It is the responsibility of all staff, board members, and volunteers to comply with the Foundation's Code of Ethics and applicable law and to report violations or suspected violations in accordance with this Whistleblower Policy.

Confidentiality

The Foundation will treat all communications under this Policy in a confidential manner, except to the extent necessary (1) to conduct a complete and fair investigation, or (2) for review of Foundation operations by the Foundation's Board of Directors, its Audit Committee, the Foundation's independent public accountants, and the Foundation's legal counsel.

Retaliation

The Foundation will not permit any negative or adverse actions to be taken against any employee or individual for making a good faith report of a possible violation of its Code of Ethics or applicable law, even if the report is mistaken, or against any employee or individual who assists in the investigation of a reported violation. Retaliation in any form will not be tolerated. Any act of alleged retaliation should be reported immediately and will be promptly investigated. 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. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within the Foundation prior to seeking resolution outside the Foundation.

How to Report Concerns or Complaints

Employees and others may communicate suspected violations of its Code of Ethics, applicable law or other wrongdoing or alleged retaliation on a toll-free telephone number set up for this purpose where you may leave a message. That telephone number is 1-877-888-0002 and is hosted by The Network, an independent private organization not affiliated with the Foundation, which provides a dedicated toll-free number accessible at all times, providing a confidential way for individuals to report concerns or complaints. In order to better respond to any information or complaint, we would prefer that you identify yourself and provide your contact information when you make the report. Any information will be treated with utmost confidence. If you wish to remain anonymous, it is not necessary that you give your name or position in any notification and caller ID will not be activated on the toll-free number. The complaint will then be forwarded to the Foundation board member designated to handle such issues.

Whether you identify yourself or not, for a proper investigation to be conducted, please provide us with as much information as you can, sufficient to do a proper investigation, including where and when the incident occurred, names and titles of the individuals involved, and as much other detail as you can provide.

Illustrative Types of Concerns

The following is a non-exhaustive list of the kinds of improprieties that should be reported:

- Supplying false or misleading information on the Foundation's financial or other public documents, including its tax return (Form 990);
- Providing false information to or withholding material information from the Foundation's board of directors or auditors;
- Destroying, altering, mutilating, concealing, covering up, falsifying, or making a false entry in any records that may be connected to an official proceeding, in violation of federal or state law or regulations;
- Altering, destroying or concealing a document, or attempting to do so, with the intent to impair the document's availability for use in an official proceeding or otherwise obstructing, influencing or impeding any official proceeding, in violation of federal or state law or regulations;
- Embezzlement, self-dealing, private inurement (i.e., Foundation earnings inuring to the benefit of an individual) and private benefit (i.e., Foundation assets being used for personal gain or benefit);
- Payment for services or goods that are not rendered or delivered;
- Remarks or actions of a sexual nature that are not welcome and are likely to be viewed as personally offensive, including: sexual flirtations, unwelcome physical or verbal advances, sexual propositions, verbal abuse of a sexual nature, the display of sexually suggestive objects, cartoons or pictures, and physical contact of a sexual or particularly personal nature.;
- Use of epithets, slurs, negative stereotyping, and threatening, intimidating or hostile acts that relate to race, color, religion, gender, national origin, age or disability;

- Circulating or posting written or graphic material in the workplace that denigrates or shows hostility or aversion toward an individual or group because of race, color religion, gender, nationality, age or disability;
- Discrimination against an employee or potential employee due to a person's race, color religion, sex, sexual orientation, national origin, age, physical or mental impairment or veteran status;
- Violations of the Foundation's Statement of Values and Code of Ethics, Conflicts of Interest Policy, Harassment Policy or Equal Employment Policy;
- Facilitating or concealing any of the above or similar actions.

Questions

If you have any questions regarding this policy, please contact the Human Resource office of the Foundation at 650-724-5765.