



Health Forward

FOUNDATION

Whistleblower Policy

PURPOSE AND SCOPE

Health Forward is committed to establishing a culture of compliance, including one that promotes the prevention, reporting, and remediation of conduct that does not comply with Health Forward policies or applicable laws. In furtherance of that commitment, Health Forward encourages the reporting of any violation or potential violation of (i) any policy or procedure of Health Forward or (ii) any law that applies to Health Forward or that involves, or could have an adverse impact, on Health Forward's operations, property, reputation, or business relationships.

POLICY

Under this policy, a whistleblower is defined as any individual or entity, including without limitation, a Health Forward board member, employee, vendor, contractor, or grantee who becomes aware of or suspects any type of misconduct within the scope of this policy and reports the concern in accordance with this policy. Illegal misconduct not covered by this policy should be reported to the appropriate law enforcement or regulatory agency.

Examples of misconduct covered by this policy include:

- **Corruption and fraud:** Theft of any kind, bribery, collusion, fraudulent reporting, misuse of funds, or violation of ethics.
- **Employment law violations:** Illegal discrimination, harassment, or other non-compliance with applicable employment laws.
- **Misuse of property:** Misuse of supplies, equipment, records, or other property.
- **Misuse of information:** Misuse or inappropriate disclosure of confidential or proprietary information.

Reporting Options

Health Forward uses Red Flag Reporting, a third-party reporting service, to receive concerns via online, text, phone call, email, mail, or fax. Hotline links and contact information are available on HealthForward.org through the Whistleblower Complaint link located in the footer of the website.

Submitted concerns are automatically routed to the current Audit Committee chair, Board chair, and Health Forward Chief Administrative, Financial, and Investment Officer. These individuals have authority to forward concerns to management or other governing committees as they deem appropriate. If the concern centers around one or more of these individuals, the whistleblower can select to block delivery to those individuals through the reporting service.

Confidentiality

Whistleblowers reporting a concern through Red Flag Reporting may choose to reveal their identity, remain anonymous, or request that their identity not be disclosed. The identity of the whistleblower will be kept confidential to the fullest extent possible, unless doing so does not comply with applicable law or prevents a full and effective investigation of the reported misconduct.

Handling of Reports

The chair of the Audit Committee and chair of the Board will be responsible for receiving, investigating, and determining whether a reported concern is within the scope of this policy. If determined to be appropriate, the chairs will recommend or take disciplinary, remedial, or corrective action with respect to the reported concern, which may include referral to an appropriate law enforcement and/or regulatory agency. Should a concern be reported outside of the reporting system to a Health Forward supervisor or department head, these individuals must immediately communicate the concern to the chair of the Audit Committee and chair of the Board.

Non-Retaliation

Retaliation against any whistleblower is strictly prohibited. Regardless of the merits of the reported concern, those who retaliate or threaten retaliation may be subject to disciplinary, remedial, or corrective action, up to and including termination of employment, association, or relationship with Health Forward. A whistleblower who believes they have experienced retaliation should submit another report through Red Flag Reporting in accordance with this policy.

Good Faith Reporting

Reporting a concern by a whistleblower must be done in good faith. "Good faith" for purposes of this policy means the whistleblower has a genuine belief that misconduct covered by this policy has occurred in the past, is currently occurring, or may occur in the future, regardless of whether a subsequent investigation finds no evidence of actual misconduct.