

John T. Gorman Foundation

Anti-Fraud (“Whistleblower”) Policy

General

The John T. Gorman Foundation (the “Foundation”) expects its directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities on behalf of the Foundation. As representatives of the Foundation, such directors, officers and employees must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations and all policies of the Foundation. “Wrongful Conduct”, as defined in this Policy, of any kind is prohibited.

Reporting Responsibility

It is the responsibility of all directors, officers and employees to report Wrongful Conduct to an appropriate representative of the Foundation in accordance with the provisions of this Policy.

“Wrongful Conduct” is any activity in violation of any state, federal or local law or regulation or any Foundation policy undertaken by a director, officer or employee in the performance of such individual’s official duties, whether or not such activity is within the scope of his or her intended responsibilities on behalf of the Foundation. This includes, but is not limited to, corruption, malfeasance, bribery, theft, fraud, coercion, conversion, malicious prosecution, harassment, or misuse of the Foundation’s property and facilities.

No Retaliation

No director, officer or employee who reports Wrongful Conduct in good faith in accordance with this Policy shall suffer harassment, retaliation or adverse employment consequence. This Policy is intended to encourage and enable directors, officers and employees to raise serious concerns with the Foundation.

Directors, officers and employees are also protected against retaliation for providing information to, or otherwise in an investigation by, a regulatory authority or law enforcement agency, any member of Congress or committee of Congress, or who has authority to investigate, discover or terminate Wrongful Conduct where such information or investigation relates to any conduct of the Foundation that the reporting individual believes constitutes Wrongful Conduct within the meaning of this Policy. Any director, officer or employee who files, testifies, participates in, or otherwise assists in a proceeding relating to alleged Wrongful Conduct is also protected against retaliation. Acts of retaliation by any director, officer or employee are prohibited.

Reporting Violations

A director, officer or employee who wishes to report Wrongful Conduct is asked to make such report to the President of the Foundation, who has specific responsibility to investigate all reported Wrongful Conduct. If an investigation substantiates that Wrongful Conduct has taken place, the President will report such conduct to the board of directors. If for some reason a

director or officer prefers not to make the report of Wrongful Conduct to the managing director, he or she should make such report to any other officer of the Foundation.

Acting in Good Faith

Anyone filing a report concerning a violation or suspected violation of law or other Wrongful Conduct must be acting in good faith and have reasonable cause for believing the information disclosed indicates a violation of law or other Wrongful Conduct. 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

Reports of Wrongful Conduct may be submitted on a confidential basis by the complainant or may be submitted anonymously. Such reports will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Wrongful Conduct

The President or other officer will notify the individual who has made a report under this Policy of the Foundation's receipt of the report of Wrongful Conduct within five business days of his or her receipt of the report. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.