

Rett Syndrome Research Trust Whistleblower Policy

General

The Rett Syndrome Research Trust (RSRT) Code of Conduct (hereinafter referred to as the Code) requires trustees, employees and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Trustees, employees and representatives of the organization must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

The objectives of the RSRT Whistleblower Policy are to establish policies and procedures for:

- The submission of concerns regarding questionable accounting or auditing matters by employees, trustees, officers, and other stakeholders of the organization, on a confidential and anonymous basis.
- The receipt, retention, and treatment of complaints received by the organization regarding accounting, internal controls, or auditing matters.
- The protection of trustees, employees and volunteers reporting concerns from retaliatory actions.

Reporting Responsibility

A protected person shall be encouraged to report information relating to illegal practices or violations of policies of the Organization (a “Violation”) that such person in good faith has reasonable cause to believe is credible. Information shall be reported to the Executive Director, unless the report relates to the Executive Director, in which case the report shall be made to Board of Trustee Chair. Anyone reporting a Violation must act in good faith, and have reasonable grounds for believing that the information shared in the report indicates that a Violation has occurred.

Investigating Information

The Executive Director or the Board Chair shall promptly investigate each such report and prepare a written report to the Board of Trustees. Appropriate corrective action will be recommended. In addition, action taken must include a conclusion and/or follow-up with the complainant for complete closure of the Violation.

Confidentiality

Reports of Violations, and investigations pertaining thereto, shall be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. Disclosure of reports to individuals not involved in the investigation will be viewed as a serious disciplinary offense and may result in discipline, up to and including termination of employment. Such conduct may also give rise to other actions, including civil lawsuits.

No Retaliation

This Whistleblower Policy is intended to encourage and enable trustees, volunteers, and employees to raise concerns within RSRT for investigation and appropriate action. With this goal in mind, no trustee, volunteer, or employee who, in good faith, reports a Violation shall be subject to retaliation or, in the case of an employee, adverse employment consequences. Moreover, a volunteer or employee who retaliates against someone who has reported a



Violation in good faith is subject to discipline up to and including dismissal from the volunteer position or termination of employment.