



Sjögren's Foundation Whistleblower Policy

1. Purpose

The Sjögren's Foundation is committed to the highest standards of integrity, transparency, and accountability in all aspects of its work. The Sjögren's Foundation encourages all directors, officers, employees, volunteers, and representatives to **speak up and report concerns** regarding suspected unlawful, unethical, or improper conduct.

Reporting concerns helps protect the Sjögren's Foundation, its stakeholders, and its mission. Individuals are encouraged to raise concerns early — even if they are unsure whether a violation has occurred — without fear of retaliation. This policy establishes a clear and confidential process for reporting and addressing concerns.

Although this policy is available for public viewing, all reports, investigations, and identities will remain confidential.

2. Scope

This policy applies to all individuals affiliated with the Sjögren's Foundation, including:

- Board members
- Officers
- Employees
- Volunteers
- Contractors and representatives

All individuals share responsibility for maintaining ethical standards and reporting concerns in good faith.

3. Standards of Conduct

All individuals are expected to:

- Act with honesty, integrity, and professionalism
- Comply with applicable laws and regulations
- Follow Sjögren's Foundation policies, including the Conflict of Interest Policy
- Safeguard Sjögren's Foundation assets and reputation

Failure to meet these standards may result in investigation and corrective action.

4. Reportable Concerns

Individuals should report concerns including, but not limited to:

Financial Misconduct

- Fraud, theft, or misuse of funds or assets
- Misleading financial reporting
- Accounting or auditing irregularities

Governance or Policy Violations

- Violations of Board policies or Conflict of Interest Policy
- Improper record handling or destruction

Legal or Regulatory Violations

- Violations of laws or regulations
- Unethical or improper business practices

Workplace or Safety Concerns

- Harassment or discrimination
- Unsafe working conditions

Other Improper Conduct

- Any behavior inconsistent with the Sjögren's Foundation's mission, policies, or ethical standards

5. Reporting Responsibility

All individuals are encouraged to report concerns **promptly and in good faith**.

“Good faith” means the individual reasonably believes the information provided indicates a potential violation, even if all facts are not known.

6. Reporting Procedures

The Sjögren's Foundation maintains a simple and accessible reporting process.

Concerns may be reported through any of the following:

- Your manager or member of leadership
- The Chief Executive Officer (CEO)
- The Chair of the Board or Chair of Governance Committee (Vice Chair)

If the concern involves financial reporting, accounting, or internal controls, it should be reported to the CEO unless the report is about the CEO and it should then be reported to the Chair of the Board and the Chair of the Governance Committee (Vice Chair).

Reports may be made:

- Verbally or in writing
- Confidentially or anonymously

If you would like to submit a written report, either confidentially or anonymously, please [complete this form](#). The first question of the form will ask you to select whether a report is being made about the CEO, and if the answer is yes, the completed form will be sent to the Vice Chair and Chair of the Board of Directors. If the concern is about another individual (e.g. a staff member, contractor, volunteer, or Board member), the form will be sent to the CEO. Action will be taken immediately and as appropriate for the specific concern, and follow-up will occur based on the submitters preference stated on the form.

7. Confidentiality

Reports will be handled as confidentially as possible, consistent with the need to conduct a thorough and fair investigation.

Information will be shared only with those responsible for reviewing and resolving the matter.

8. Investigation Process

All reports will be reviewed promptly and handled in a fair and impartial manner.

Investigations may involve:

- Sjögren's Foundation leadership
- The Executive Committee and Governance Committee of the Board of Directors
- External advisors (e.g., legal counsel or auditors), when appropriate

The Sjögren's Foundation will take appropriate corrective action based on the findings.

9. No Retaliation

The Sjögren's Foundation strictly prohibits retaliation against any individual who reports a concern in good faith or participates in an investigation.

Retaliation includes, but is not limited to:

- Harassment
- Intimidation
- Discrimination
- Termination or demotion
- Any adverse action

Any individual who believes they have experienced retaliation should report it immediately.

Retaliation will be treated as a serious violation of this policy.

10. Good Faith Reporting

Individuals are expected to report concerns honestly and in good faith. Reports that are knowingly false or made with malicious intent may result in disciplinary action.

11. Corrective Action

If a violation is confirmed, the Sjögren's Foundation may take appropriate action, including:

- Disciplinary measures
 - Policy or process improvements
 - Strengthening internal controls
 - Referral to legal or regulatory authorities
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12. Recordkeeping and Oversight

The Sjögren's Foundation will maintain records of reports and investigations in accordance with its record retention policies. The Governance Committee will receive periodic summaries of:

- Number and types of reports
 - General outcomes
 - Any corrective actions taken
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13. Policy Distribution and Acknowledgment

This policy will be distributed to all covered individuals.

Acknowledgment of this policy may be required upon onboarding and periodically thereafter.

14. Policy Review

The Board of Directors will review this policy periodically to ensure alignment with:

- Legal requirements
 - Industry best practices
 - The Sjögren's Foundation's commitment to ethical conduct
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Approved and adopted by the Board of Directors of the Sjögren's Foundation on June 13, 2026.