

REPORTING OF A VIOLATION OF CODE OF ETHICS ("Whistleblower Policy")

I. Purpose

The purpose of this policy is to provide all directors, officers, committee members, staff and volunteers with guidelines for the reporting of **unethical or illegal** behavior by Hemophilia Federation of America ("HFA"), directors, officers, committee members, staff, volunteers, vendors, professional service providers, or affiliated persons or organizations.

II. Policy

HFA is committed to lawful and ethical behavior in all of its activities and requires its directors, officers, committee members, staff and volunteers ("HFA representative") to conduct themselves in a manner that complies with all applicable laws and regulations. Any time an HFA representative has an issue regarding the propriety or legality of any action contemplated to be taken, or that has been taken by the HFA, or by any other HFA representative, or believes that an action needs to be taken for HFA to be in compliance with the law or other appropriate ethical standards, the HFA person should promptly advise the President, Chairman of the Board, or General Counsel in the event that the President and Chair are the subject of the complaint. Reports may also be conveyed anonymously.

Every effort will be made to investigate a report by an HFA representative as discreetly as possible. Because of the need to investigate the report, correct a problem, or prevent future problems, HFA cannot, however, promise complete confidentiality to HFA representatives who identify themselves.

III. No Retaliation

No HFA representative will be discharged, threatened, or discriminated against in any manner for reporting in good faith what he or she reasonably perceives to be wrongdoing, violations of law, or unethical conduct.

Approved by the Board of Directors on the 21st day of April 2021.