

BRAZILFOUNDATION WHISTLEBLOWER POLICY

Adopted on October 10, 2012

If a staff member thinks he or she has, or in good faith thinks another staff member has, violated any provisions of **Brazil**Foundation's **Code of Conduct**, or has engaged in any unlawful or unethical behavior, that staff member should immediately report the suspected violation to his or her immediate supervisor or to the President of **Brazil**Foundation.

Individuals should not feel obligated to file their complaints with their immediate supervisor first before bringing the matter to the attention of one of the other **Brazil**Foundation representatives identified above. Reported violations of this Code will be investigated, addressed promptly and treated confidentially consistent with the need to investigate, prevent or correct the violation.

No one reporting an actual or suspected violation or other unlawful act in good faith will be subject to retaliation of any kind. Retaliation against an individual for reporting an actual or suspected violation in good faith or for participating in an investigation of a violation may be subject to disciplinary action.