



WHISTLEBLOWER POLICY

The University of Maryland Foundation, Inc. (d/b/a the University System of Maryland, Inc.) is committed to the highest standards of financial reporting and of lawful and ethical behavior. To reflect this commitment, the Board of Directors has adopted the following policy for the filing of complaints of alleged illegal or unethical conduct in connection with the Foundation's finances and other aspects of its operations and the retention and treatment of such complaints, including confidential, anonymous submissions received from employees. The Foundation encourages its employees to voice their concerns without fear of retaliatory or discriminatory action.

Should any individual know or have a reasonable and good faith belief that a person or persons associated with the Foundation plan to engage or have engaged in illegal or unethical conduct in connection with the finances or other aspect of the Foundation's operations, then that individual should promptly file a written complaint with the President and CEO, the General Counsel or the Chair of the Audit Committee of the Foundation (each such individual, a "Responsible Official"). A Responsible Official who receives a complaint under this policy must promptly share the complaint with the other two Responsible Officials unless the complaint relates to either or both of them, in which case such a Responsible Official would be disqualified from further involvement in the complaint.

Employees may submit written complaints on a confidential and anonymous basis. In conducting its investigations, the Foundation will strive to maintain an employee's request for anonymity and will strive to keep the identity of other complainants as confidential to the extent possible, consistent with the need to conduct an adequate review and investigation.

The Responsible Officials will investigate each complaint promptly and thoroughly and in connection with their investigation, may retain outside legal counsel, accountants, auditors, private investigators or any other resource that they reasonably believe is necessary to conduct a full and complete investigation of a complaint. The investigating Responsible Officials will report each complaint to the Audit and Executive Committees no later than their next scheduled meetings. The Executive Committee shall then decide whether and when to inform the Board as a whole of a complaint.

The Foundation will take appropriate action in response to any substantiated complaint, including, but not limited to, disciplinary action (to and including termination of employment) against any person who, in the Foundation's assessment, has engaged in misconduct. In addition, the Foundation shall report such misconduct to the relevant civil and criminal authorities as required by law.

Neither the Foundation nor any Foundation employee or director, acting in their capacity as an employee or director, will knowingly, with intent to retaliate, take any action harmful to any

person, including interference with lawful employment or livelihood, for reporting a complaint in good faith pursuant to this policy or for reporting a complaint in good faith to law enforcement officers or governmental agencies or bodies.

Likewise, there will be no punishment or retaliation for providing information regarding a complaint in good faith to, or otherwise assisting in any investigation regarding a complaint conducted by, the Foundation, law enforcement officers, governmental agencies or bodies, or persons with supervisory authority over the complainant. Finally, there will be no punishment or other retaliation for filing a good faith complaint, or otherwise participating or assisting in a proceeding filed or about to be filed (with any knowledge of the Foundation) regarding the complaint. An individual who knowingly or maliciously provides false information may be subject to disciplinary action (up to and including termination of employment) by the Foundation.

Adopted 2/22/2024