



THE LUC COCHRAN FOUNDATION

Where Opportunity Meets Technology to Build Futures.

Whistleblower Policy

A governance policy of The Luc Cochran Foundation Inc.

Legal Name: The Luc Cochran Foundation Inc.

Tax Status: 501(c)(3) Public Charity

EIN: 99-1959689

Version Date: August 30, 2026

1. Purpose

The Luc Cochran Foundation Inc. (the "Foundation") is committed to conducting its operations lawfully, ethically, and with integrity. This Whistleblower Policy is intended to encourage and enable individuals to raise serious concerns internally so that the Foundation can investigate and address inappropriate conduct, and to provide protection from retaliation for those who report such concerns in good faith.

2. Scope

This policy applies to all directors, officers, employees, volunteers, contractors, and other stakeholders of the Foundation. Reports may concern any actual or suspected violation of law, organizational policy, or ethical standard, including but not limited to: financial impropriety; fraud or theft; misuse of Foundation resources; conflicts of interest; discrimination or harassment; violations of safety or privacy; or other conduct that could harm the Foundation, its people, or the communities it serves.

3. Reporting Concerns

Individuals who have a good-faith concern are encouraged to report the matter promptly. Reports may be made to any of the following:

- The Executive Director or President of the Foundation.
- The Chair of the Board of Directors.
- A designated compliance officer or reporting channel established by the Board.

Reports should include sufficient detail to permit a meaningful review, including the nature of the concern, the individuals involved, and any relevant dates, locations, or evidence.

4. Confidentiality

The Foundation will treat reports confidentially to the extent permitted by law and consistent with the need to conduct an adequate investigation. The identity of the person making a report will be kept confidential when requested and when doing so does not impede the investigation.

5. Investigation

Upon receipt of a report, the Board of Directors or its designee will determine the appropriate course of action. The Foundation may conduct an internal review or engage independent advisors as warranted. The subject of a report will generally be informed of the allegations as necessary to conduct a fair investigation, but the Foundation reserves the right to limit disclosure during the pendency of an investigation.

6. Non-Retaliation

The Foundation prohibits retaliation against any individual who, in good faith, reports a concern, participates in an investigation, or assists in the resolution of a reported matter. Retaliation is a serious violation of this policy and may result in disciplinary action, up to and including removal from the Board, termination of employment, or termination of a volunteer or contractor relationship.

7. Good-Faith Requirement

This policy protects good-faith reports. A report is not made in good faith if it is knowingly false, malicious, or intended to harass or defame another individual. Individuals who make knowingly false reports may be subject to disciplinary action.

8. Records

The Foundation will maintain appropriate records of reports received and investigations conducted, subject to confidentiality and legal privilege considerations.

ADOPTED BY THE BOARD OF DIRECTORS

This policy was reviewed and adopted by the Board of Directors of The Luc Cochran Foundation Inc. and shall remain in effect until amended or superseded by a subsequent board action.