



TB Alliance Whistleblower Policy 3.0

Document Name:	TB Alliance Whistleblower Policy 3.0 01Apr2024		
Overview:	<p>TB Alliance is committed to maintaining the highest standards of business practice and to ensure we operate in a manner that is fully compliant with all legal and regulatory requirements and standards of ethical behavior. We expect our employees, officers, directors, advisors and any agents of the organization to act in accordance with both internal policy and law. This policy provides the following guidelines:</p> <ul style="list-style-type: none"> • <i>Policy</i> • <i>Obligation to Report and Procedure for Reporting Complaints</i> • <i>Handling of Complaints Received</i> • <i>Action on Reports</i> • <i>Protection Under Policy</i> <p>This policy replaces “TB Alliance Whistleblower Policy 01Jun2019” as of the effective date below.</p>		
Scope:	<p>This policy is intended to remind directors, officers and employees of this expectation, encourage all to report concerns about possible violations, lay out procedures for reporting and investigating complaints, and describe the protections afforded under this policy.</p> <p>The Board of Directors of TB Alliance will oversee this policy.</p>		
Effective Date:	April 1, 2024	Version Number:	3.0
Associated Policies:	<ul style="list-style-type: none"> • TB Alliance Record Retention Policy 3.0 01Oct2013 		
Management Representative:	<p>DocuSigned by:</p> <p><i>Colleen Pero</i></p> <p>AAF1E6236CF4466...</p>		



Table of Contents

	<i>Page</i>
Policy	3
Obligation to Report and Procedure for Reporting Complaints.....	3
Handling of Complaints Received.....	3
Action on Reports	4
Protection Under Policy	4



Policy

This policy covers complaints made regarding TB Alliance's financial resources and operations, allegations of research or scientific misconduct, regulatory non-compliance, and all other unlawful, unethical or improper behavior addressed by TB Alliance's equal employment opportunity policies, including its stance against harassment, retaliation, or discrimination.

Obligation to Report and Procedure for Reporting Complaints

Any TB Alliance employee, officer or member of the Board of Directors who knows, or has reasonable belief, that persons associated with TB Alliance have engaged or plan to engage in illegal, improper or unethical conduct, including any suspected instances of fraud, is expected to report the conduct immediately.

A report may be made via web or phone directly to our hotline, managed by a third party, on a confidential basis in the following ways:

- **Website:** [Report a Concern](#)
- **Toll-Free Telephone:**
 - English speaking USA and Canada: 833-960-0007
 - Spanish speaking USA and Canada: 800-216-1288
 - French speaking Canada: 855-725-0002
 - Spanish speaking Mexico: 01-800-681-5340
 - All other countries: 800-603-2869 (must dial country access code first)

A report can be made anonymously, if desired, and should provide as much detail as possible.

Handling of Complaints Received

- Unless anonymous, reports will be acknowledged within 24 hours.
- All complaints will be forwarded to the designated recipients, specifically the President and Chief Executive Officer, Chief Administrative Officer, and Head of Human Resources. If the report concerns the President or other designated recipients, it will be forwarded directly to the Chair of the Board.
- The complaint will be investigated promptly, possibly with advice of counsel or other outside advisors, and further action will be undertaken based on the outcome of the investigation.



- In conducting the investigation, TB Alliance will strive to keep as confidential as possible the identities of individuals who report the conduct and those who provide information during the investigation, except TB Alliance may share such information as required to complete the investigation or as required by law.
- The President or Chair of the Board (or, if applicable, another member of the Executive Committee) will report to the full Board on any report that is determined to be material and credible. This report will generally describe the conduct and status of any investigation and any recommendations to address the complaint.
- The Chair of the Board (or, if applicable, another member of the Executive Committee) will ensure that records are retained for the appropriate duration in accordance with TB Alliance's Record Retention policy.

Any TB Alliance employee, officer or director who is contacted in the course of investigating a report is expected to cooperate fully and truthfully. All complaints and information are expected to be provided in good faith. Any employee, officer or director who deliberately provides false information will be subject to disciplinary action, up to and including termination of employment or removal from the Board of Directors.

Action on Reports

TB Alliance will take appropriate action in response to reported conduct, including disciplinary action (up to and including termination of employment), and where appropriate, will report the conduct to law enforcement authorities. Additionally, TB Alliance will report violations of this policy to any affected funders, in accordance with the funder's reporting policy.

Protection Under Policy

TB Alliance will not knowingly, with the intent to retaliate, take any action harmful to any director, officer or employee, for:

- reporting a complaint in good faith pursuant to this policy or to law enforcement officers, governmental agencies or bodies, or persons with supervisory authority over the complainant;
- providing in good faith information regarding a complaint to law enforcement officers, governmental agencies or bodies, or persons with supervisory authority over the complainant, or otherwise assisting in any investigation conducted by TB Alliance, or participating or assisting in a proceeding filed or about to be filed.



Any director, officer or employee who retaliates against another for reporting a complaint in good faith pursuant to this policy will be subject to disciplinary action, up to and including termination from employment or removal from the Board of Directors.