

**VIETNAM VETERANS MEMORIAL FUND, INC.**

**WHISTLEBLOWER POLICY**

Vietnam Veterans Memorial Fund, Inc. (“VVMF”) promotes ethical conduct, transparency and compliance with the law. VVMF is hereby augmenting the other policies and procedures it has in place to provide that should any person know of, or have a suspicion about, illegal or unethical conduct in connection with the finances or other aspect of VVMF’s operations, that person should inform the President. If the alleged wrongdoing concerns the President, then another Officer or Board Director of VVMF should be notified instead.

Should any Officer or Board Director of VVMF receive credible information regarding alleged misconduct in connection with the finances or other aspect of operations, those officers or directors shall inform the full Board of Directors.

Any reported credible allegation will be investigated promptly, thoroughly and impartially. The investigation may include individual interviews with the parties involved and, where necessary, with individuals who may have observed the alleged conduct or may have other relevant knowledge.

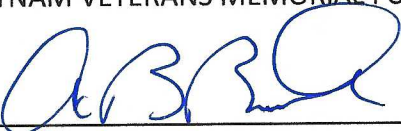
VVMF prohibits any act of retaliation against an employee who reports misconduct or cooperates in an investigation of a complaint. VVMF will preserve confidentiality to the extent the needs of the investigation permit.

Any employee found to have engaged in conduct that violates this policy or who retaliates against an employee in connection with this policy or any employee who does not fully cooperate with an investigation of a complaint will be subject to discipline, up to and including termination of employment.

**Certificate of Adoption**

The foregoing Whistleblower Policy was duly adopted by the Board of Directors of VVMF effective as of December 6, 2021.

VIETNAM VETERANS MEMORIAL FUND, INC.

By   
Alan Buckelew, Chairman