



PKD FOUNDATION

Polycystic Kidney Disease

OMBUDSMAN POLICY

General

The PKD Foundation has a Code of Ethics (“Code”) that requires trustees, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. The PKD Foundation expects all of its employees and representatives to fulfill their responsibilities with honesty and integrity and comply with all applicable laws and regulations.

It is important that the PKD Foundation be apprised about unlawful or improper behavior including, but not limited to, any of the following conduct:

- Theft;
- Financial reporting that is intentionally misleading;
- Improper or undocumented financial transactions;
- Improper destruction of records;
- Improper use of assets;
- Violations of the PKD Foundation’s conflict-of-interest policy; and
- Any other improper occurrence regarding cash, financial procedures, or reporting.

Reporting Responsibility

It is the responsibility of all trustees, officers and employees to comply with the Code and to report violations or suspected violations in accordance with this Ombudsman Policy.

No Retaliation

No trustee, officer or employee who in good faith reports a violation of the Code shall suffer harassment, retaliation or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Ombudsman Policy is intended to encourage and enable employees and others to raise serious concerns within the PKD Foundation prior to seeking resolution outside the PKD Foundation.

Reporting Violations

Employees should report Code violations to someone who can address them properly (typically, the employee’s supervisor). However, if an employee is not comfortable speaking with his supervisor or not satisfied with the supervisor’s response, then the employee is encouraged to speak with anyone in management. Supervisors and managers are required to report suspected violations of the Code to the PKD Foundation’s Ombudsman, who will investigate all reported violations. For suspected fraud, or when an employee is not satisfied or uncomfortable with reporting a violation to management, the PKD Foundation’s Ombudsman should be contacted directly.

Ombudsman

The PKD Foundation’s Ombudsman is responsible for investigating and resolving all reported complaints and allegations concerning violations of the Code and, at his discretion, shall advise the President & CEO, or chair of the board of trustees. The Ombudsman has direct access to the Human Resources Committee of the board of trustees and reports to the Human Resources Committee at least annually on compliance activity. The PKD Foundation’s Ombudsman is the chair of the Human Resources Committee.

Accounting and Auditing Matters

The Human Resources Committee of the board of trustees shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Ombudsman shall immediately notify the Human Resources Committee of any such complaint and work with the committee until the matter is resolved.

Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation of the Code must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Code. The making of any allegations that prove not to be substantiated, and which prove to have been made maliciously or knowingly to be false, will be viewed as a serious disciplinary offense.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Violations

The Ombudsman will notify the sender and acknowledge receipt of the reported violation or suspected violation within ten business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

Current Ombudsman

Mr. Craig Ramseyer

Chair, Human Resources Committee
12544 High Bluff Drive, Suite 300
San Diego, CA 92130
(619) 515-3227