

The Pew Charitable Trusts Whistleblower Policy

The Pew Charitable Trusts (Pew) is committed to openness, integrity, responsibility, accountability and lawful and ethical behavior in all of its activities. This commitment requires that all Pew directors, employees and agents (including but not limited to consultants and contractors) conduct themselves in a manner that complies with both the letter and the spirit of all applicable laws and Pew policies (together referred to as “Pew’s Rules”).

To honor this commitment, you must immediately report if you observe, experience or learn of a possible violation of Pew’s Rules even if it may appear to you that the conduct involved is helping to achieve a Pew goal. Our goals are to be achieved *only* through the highest level of ethical conduct. Failure to report a possible violation of Pew’s Rules may result in disciplinary measures up to and including termination of employment or other relationship with Pew.

This policy aims (i) to provide you with an avenue for raising concerns regarding potential unlawful or unethical behavior and (ii) to reassure you that you will be protected from reprisal as a consequence of reporting any alleged wrongdoing by any Pew director, employee or agent.

Reporting Concerns

If you have a good faith concern regarding the legality or ethical propriety of any action taken or contemplated to be taken by Pew or one of its directors, employees or agents, or if you have a good faith belief that action needs to be taken to ensure that Pew remains in compliance with its Rules, please promptly raise the matter first with your own supervisor or contact at Pew.

If you are not comfortable speaking with your supervisor or contact or you are not satisfied with your supervisor or contact’s response, you are encouraged to speak with the senior director, compliance; senior vice president legal affairs, general counsel; or the president. If you are not comfortable with any of these options, you may report a possible violation anonymously through the ethics and compliance hotline at www.pewtrusts.ethicspoint.com, which is hosted by an independent third party.

Illustrative Types of Reportable Conduct

The following is a *non-exhaustive* list of the types of conduct you are obligated to report:

- any matter involving impropriety in accounting, internal accounting controls or auditing matters, including:
 - fraud, deliberate error, or misrepresentation (oral or written) in the preparation, maintenance, evaluation, review or audit of any financial statement, financial record or other public document, including Pew’s tax return (Form 990);
 - deficiencies in or non-compliance with Pew’s internal accounting controls, policies or procedures; or
 - providing false information to or withholding material information from Pew’s auditors, directors or officers;
- embezzlement or other private benefit (*i.e.*, Pew assets being used for any person’s own benefit);
- violation of Government Gifts and Ethics Rules;
- violation of Pew’s Conflict of Interest, Respect in the Workplace, Confidentiality or Whistleblower Policies;
- payment for services or goods that are not rendered or delivered; or

- facilitating or concealing any of the above or similar actions.

Anyone who raises a concern about possible unlawful or unethical conduct must act in good faith and have reasonable grounds for believing that the information disclosed indicates such impermissible conduct. Anyone who raises an allegation that is *both* (i) not confirmed *and* (ii) made maliciously, knowing that it is not true, or with reckless disregard for its truth, will be subject to serious disciplinary action up to and including termination and any other available legal remedies.

Investigation

Pew will thoroughly investigate all concerns reported per this policy and take appropriate corrective action if warranted. All reports will be treated confidentially and as discreetly as reasonably possible, consistent with Pew's need to conduct an adequate investigation, implement any remedies and satisfy legal obligations.

No Retaliation

Pew strictly prohibits retaliation of any kind (including but not limited to compensation or terms, conditions, location or privileges of employment) against anyone who in good faith reports or raises concerns under this policy. We likewise strictly prohibit retaliation against any individual for participating or cooperating in good faith in any investigation.

Any person who threatens or retaliates against another individual who in good faith reports a possible violation per this policy may be subject to appropriate remedial and/or disciplinary measures up to and including termination of her/his employment or other relationship with Pew and possibly civil and/or criminal liability. This non-retaliation policy is designed to assure every director, employee and agent that Pew seriously encourages and relies on their open and frank communication of genuinely held concerns about possible unlawful or unethical conduct, regardless of how these concerns are reported or raised.

This policy of non-retaliation applies to all reports made in good faith, even if no wrongdoing is ultimately found. It does not, however, apply to any allegation that is *both* (i) not confirmed *and* (ii) made maliciously by a person either knowing that it is not true or with reckless disregard for its truth.

A quarterly report containing all appropriate whistleblower issues raised during the prior quarter will be presented to the audit committee of the board at its regular meeting. Material issues brought to the attention of management or reported through the ethics and compliance hotline will be reported to the audit chair as soon as practicable.

Pew reserves the right to amend and/or supplement this policy at any time.

Revised: January 17, 2019