

## Whistleblower Policy

Trustees, officers and employees of the Harvard-Yenching Institute (“Institute persons”) are expected to observe high standards of ethics professionally and personally, and to comply with all the applicable laws and regulations in fulfilling their duties.

It is the responsibility of any Institute person who becomes aware of an act or conduct of an Institute person believed to be unethical, or to constitute a conflict of interest or fraud, theft, embezzlement or an accounting or auditing irregularity, or bribery or misuse of Harvard-Yenching Institute assets, or a violation of applicable regulatory, compliance or ethics-related standards, to report such act or conduct to the Chair of the Audit Committee of the Board of Trustees, or in the event that the reporting Institute person is unable to, or prefers not to, contact the Chair of the Audit Committee, to the Chair of the Board of Trustees.

No Institute person who reports in good faith as provided in the preceding paragraph will be subject to retaliation or adverse consequence because of such a report. An Institute person who retaliates against another who has so reported shall be subject to discipline, which may include separation from the Institute.

The Chair receiving a report as provided above will assure that it is properly investigated and resolved, and shall keep the Audit Committee and the Board of Trustees advised of the outcome of any such matters.

Reports provided for above must be submitted on a confidential basis, and may be submitted anonymously. Reports may be submitted by any means of communication that preserves confidentiality. Non-anonymous reports will be acknowledged promptly. Insofar as possible consistent with conduct of an investigation as provided above, such reports will be kept confidential except as provided or required by law or appropriate public official.