

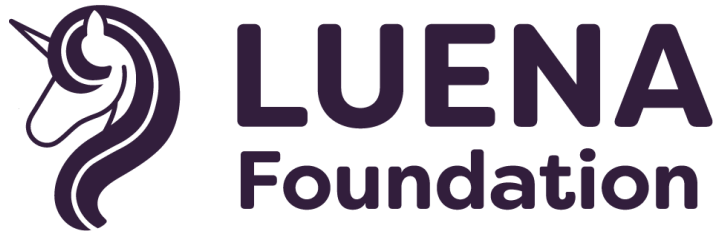
Third-Party Reports of Misconduct or Misuse of Foundation Funds

Luena Foundation (the “Foundation”), is dedicated to upholding lawful and ethical conduct across all its endeavors and the utilization of its resources. It mandates that its officers, volunteers, and associate persons adhere to behaviors aligning with applicable laws and Foundation regulations. Moreover, as a charitable entity, the Foundation is committed to ensuring the proper utilization of its funds for their designated purposes.

Parties engaging in business with the Foundation, such as grantees, contractors, vendors, and other third parties, are encouraged to report any concerns regarding the legality or appropriateness of actions taken by Foundation or the use of Foundation funds. They can do so through appropriate channels, including their respective organization's whistleblower policies and protections.

Individuals with concerns regarding the legality or propriety of actions taken by the Foundation or the use of Foundation funds can report to the Foundation by contacting its legal team. Communications should be directed to (330) 536-3539, email at admin@luena.org, or mail at Luena Foundation, 23 Kerley Court, Walnut Creek, California 94598, attn: Legal. Reports to the Foundation can be made verbally or in writing, in person, or anonymously. The Foundation encourages detailed reports and the submission of supporting documentation to aid in the investigation.

The Foundation will diligently investigate these reports and take necessary corrective action. While the Foundation endeavors to maintain confidentiality upon request, complete confidentiality cannot be guaranteed due to the need for a fair and thorough investigation and the implementation of corrective measures.



Compliance Officer

The Foundation may appoint an individual other than the Executive Director as a Compliance Officer from time to time. The Compliance Officer may be a board member or a designated third party responsible for receiving, investigating, and responding to complaints. The Foundation will notify all relevant individuals covered by this Policy upon appointing a new Compliance Officer.

Distribution

A copy of this Policy will be distributed to all individuals associated with the Foundation and will be made available on the Foundation's website. The Foundation reserves the right to amend and/or supplement this Policy at any time.