

**WHISTLEBLOWER POLICY
OF
JCAW FOUNDATION, INC.**

1. **Introduction**

JCAW Foundation, Inc. (the "Foundation"), a District of Columbia nonprofit Corporation, is open and accountable to its staff. The Foundation's board of trustees (the "Board") encourages all of its staff members to act ethically and report honestly to their supervisors and, when appropriate, to legal counsel and the Board, on any conduct or activity which they perceive to be contrary to the policies or ethics of the Foundation. The Foundation is committed to compliance with all laws and regulations to which it is subject, and to acting in all ways appropriate for organizations operating with the highest ethical standards. To that end, the Board adopts this Whistleblower Policy (this "Policy") regarding the reporting by staff members of any activities which they perceive to potentially violate law, policy or ethical standards.

2. **Scope**

This Policy is intended to cover serious concerns that could adversely impact the Foundation, such as actions that could lead to incorrect financial reporting, are unlawful, are inconsistent with announced policies or procedures, or otherwise amount to serious improper conduct. This Policy is intended to encourage and enable staff members to raise serious concerns within the Foundation prior to seeking resolution outside of the Foundation. Such conduct could include questionable accounting reports or internal controls, unethical business conduct, concerns about employee health risks, sexual harassment or discrimination on the basis of race, gender, sexual preference, religion or handicap. Every effort will be made to protect the confidentiality of any complainant, and harassment or retaliation of any sort against any complainant will not be tolerated. While anonymous complaints will be accepted, staff members are encouraged to identify themselves in order to increase the credibility of the complaint and to facilitate follow-up investigation. Malicious or knowingly false allegations, however, may result in disciplinary action.

3. **Reporting**

If feasible, staff members are encouraged to report their concern initially to their supervisor or the Foundation's chief human resources officer (if any). In most cases, an employee's supervisor is in the best position to address the concern. However, if an employee is not comfortable speaking with his or her supervisor, or if he or she is not satisfied with the supervisor's response, the employee is encouraged to speak with the Foundation's chief human resources officer (if any) or anyone in management whom the employee is comfortable approaching. Supervisors and managers are required to report suspected violations made under this Policy to the Foundation's chief human resources officer (if any) or President. If the staff member is uncomfortable with presenting the concern internally, he or she should contact the Foundation's counsel. While the staff member is not expected to prove the truth of the allegation, he or she should be prepared to be interviewed (unless the complaint is anonymous) and submit whatever evidence is available in support of the allegation.

4. Investigation

The Foundation will conduct a prompt investigation while maintaining the confidentiality of a reporting staff member. To the extent possible, report made by such staff member will be acknowledged within five business days and he or she will be notified in no more than two weeks if a broader investigation appears to be appropriate, and the form it will take. Some concerns may be resolved without the need for further investigation. If a fuller investigation is deemed appropriate, it will be conducted promptly, at no cost to a reporting staff member and will be completed, to the extent possible, within 60 days of his or her report. After the investigation, a written report, including recommendations, will be submitted to a reporting staff member, and, as appropriate, to the senior management or the Board. Where warranted and appropriate, corrective action will be taken. This may include, depending on the severity of the activity, a warning, letter or reprimand, suspension with or without pay, or termination of employment.

CERTIFICATE

This is to certify that the foregoing is a true and correct copy of the Whistleblower Policy of JCAW Foundation, Inc. and that such Whistleblower Policy was duly adopted by the board of trustees on the date below.

By: _____

Name: *Yoshihiro Kato*

Title: *Secretary*

Date: *July 30, 2012*