

Whistleblower Policy

Pura Terra Foundation requires directors, officers and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As agents and representatives of the Pura Terra Foundation, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

This Whistleblower Policy is intended to encourage and enable volunteers, officers, and others to raise serious concerns internally so that Pura Terra Foundation can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, and volunteers to report concerns about violations of Pura Terra Foundation's code of ethics or suspected violations of law or regulations that govern Pura Terra Foundation's operations.

No Retaliation

It is contrary to the values of Pura Terra Foundation for anyone to retaliate against any board member, officer, or volunteer who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of Pura Terra Foundation. Any board member, officer or volunteer who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of their position or role.

Reporting Procedure

Pura Terra has an open door policy and suggests that volunteers, officers or members of the Board share their questions, concerns, suggestions or complaints with the Board. Board members and officers are required to report complaints or concerns about suspected ethical and legal violations in writing to the Pura Terra Foundation's Board, which has the responsibility to investigate all reported complaints.

Chairman as Compliance Officer

The Pura Terra Foundation's Chairperson is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Chairperson will advise the Board of Directors of all complaints and their resolution.

Accounting and Auditing Matters

The Pura Terra Foundation's Chairman shall immediately notify the Audit Committee/Finance Committee of any concerns or complaint regarding corporate accounting practices, internal controls or auditing and work with the committee until the matter is resolved.

Acting in Good Faith

Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a

violation. 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. 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 Pura Terra Foundation's Chairman will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

A handwritten signature in black ink, appearing to read 'Shék Jain', with a long horizontal flourish extending to the right.

Shék Jain

Secretary of Pura Terra Foundation

Policy approved by the Board of Directors on May 27, 2022.