

Financial Data Exchange, LLC

Whistleblower Policy

If any officer, employee or Member reasonably believes that some policy, practice or activity of Financial Data Exchange, LLC (“**FDX**”) is in violation of law, a written explanation regarding such violation must be filed by that officer, employee or Member with either (or both) (1) Co-Chair(s) of the Board and/or (2) Co-Chair(s) of the Audit & Finance Committee. Alternatively, a reported violation may be directed to info@financialdataexchange.org, which will be forwarded to the Co-Chairs of the Board and Audit & Finance Committee. References to “**Member**” includes such Member’s officers, board members or employees participating in any FDX capacity.

It is the intent of FDX to adhere to all laws and regulations that apply to FDX and the purpose of this policy is to support FDX’s goal of legal compliance. The support of all officers, employees and Members is necessary to achieving compliance with the various laws and regulations. An officer, employee and/or Member is protected from retaliation when the officer, employee and/or Member brings the alleged unlawful activity, policy or practice to the attention of FDX and provides it with reasonable opportunity to investigate and correct the alleged unlawful activity. The protection described below is available to officers, employees and/or Members that comply with this notification requirement.

FDX will not retaliate against an officer, employee and/or Member who in good faith, has made a protest or raised a complaint against some policy, practice or activity of FDX or of another individual or entity with whom FDX has a business relationship, on the basis of a reasonable belief that the practice is in violation of law. FDX will not retaliate against an officer, employee and/or Member who, in good faith, discloses or threatens to disclose that some policy, practice or activity of FDX is in violation of a law, or a rule, or regulation mandated pursuant to law or is in violation of a clear mandate or public policy concerning the health, safety, welfare, or protection of the environment.

¹ To be set-up following approval by Board.