

The Buoniconti Fund to Cure Paralysis, Inc.
(the “Corporation”)
Whistleblower Policy

1. Purpose.

The Corporation requires employees, board members and committee members to observe high standards of business and personal ethics in the conduct of their duties and responsibilities, and all employees, directors and committee members to comply with all applicable laws and regulatory requirements.

2. Reporting Responsibility.

The Corporation seeks to have an “Open Door Policy” and encourages employees and board members to share their questions, concerns, suggestions or complaints regarding the Corporation and its operations with someone who can address them properly. In most cases, an employee, board member or committee member should present his or her concerns to the President or the Chairman of the Audit Committee. However, if an employee or board member is not comfortable speaking with the President or the Chairman of the Audit Committee or is not comfortable with the response of the President or the Chairman of the Audit Committee, the employee, board member or committee member is encouraged to speak with anyone on the Board whom the employee is comfortable in approaching.

3. No Retaliation.

No employee, board member or committee member who in good faith reports a violation of a law or regulation requirement shall suffer harassment, retaliation or adverse employment consequence. An employee, board member or committee member who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable persons to raise serious concerns within the Corporation prior to seeking resolution outside the Corporation.

4. Compliance Officer.

The Corporation’s President, working with the Chairman of the Audit Committee, will act as the Corporation’s Compliance Officer. The Compliance Officer is responsible for investigating and resolving all employee complaints and allegations. The Chairman of the Audit Committee will take on the Compliance Officer role if the complaint involves the President. If the complaint involves both the Chairman of the Audit Committee and the President, the Chairman of the Board will carry out the functions of the Compliance Officer.

5. Accounting and Auditing Matters.

The Audit Committee of the Board of Directors shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The

Compliance Officer shall immediately notify the Audit Committee of any such complaint and work with the Committee until the matter is resolved.

6. Requirement of Good Faith.

Anyone filing a complaint concerning a violation or suspected violation of the law or regulation requirements 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.

7. Confidentiality.

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

8. Handling of Reported Violations.

The Compliance Officer, or the person responsible for carrying out the Compliance Officer's role with respect to a reported or suspected violation, will acknowledge receipt of the reported violation or suspected violation by writing a letter (or e-mail) to the complainant within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.