



WHISTLEBLOWER POLICY

As of March 16, 2021

Objective and Scope

Northview Fund (collectively with its subsidiaries and entities controlled by it, the “Fund”) is committed to maintaining a workplace in which the Fund can receive, retain and address all complaints received by the Fund regarding accounting, internal accounting controls or auditing matters. For all other matters please refer to the Fund’s *Code of Business Conduct and Ethics Policy*. To achieve this goal, the Board of Trustees (the “Board”) has delegated to the Audit Committee of the Board (the “Audit Committee”) the responsibility for establishing a procedure for the confidential, anonymous submission of concerns regarding such matters.

This Whistleblower Policy (the “Policy”) has been established to enable any person to raise such concerns on a confidential basis, free from discrimination, retaliation or harassment, anonymously or otherwise. Reference is also made to the Fund’s Code of Business Conduct and Ethics.

Method of Reporting

The Audit Committee is responsible for administering this Policy. Issues and concerns regarding accounting, internal accounting controls or auditing matters may be reported to any member of the Audit Committee, orally, in writing or anonymously.

Confidentiality

All reports will be treated confidentially even if the person making such report (the “Complainant”) chooses to disclose his or her identity, as anonymity is guaranteed in the event of self-identification. However, if the Complainant fails to identify himself or herself, the Fund may not be able to adequately investigate and resolve the report if the information provided is insufficient.

Further Information

Further information may be required depending on the nature of the issue and the clarity of the information provided. Allegations made anonymously should contain sufficient detail and information so that, if necessary, a meaningful investigation can be conducted

Non-Retaliation

No trustee, director, officer or employee who in good faith submits a report under this Policy shall be subject to retaliation, harassment or an adverse employment consequence as result of such submission. Any act of retaliation should be reported immediately. A trustee, director, officer or employee who retaliates against a person who has made a report in good faith is subject to discipline up to and including dismissal.

Receiving and Investigating Reports

Complaints under this Policy are to be directed to the Fund's Audit Committee through the Chair of the Audit Committee. If contact information is provided, the Chair of the Audit Committee or their delegate will notify the Complainant and acknowledge receipt of the reported or suspected violation within five business days. All reports will be investigated by the Fund under the direction of the Audit Committee.

Should you have any questions or wish additional information regarding this Whistleblower Policy please contact the Chair of the Audit Committee of the Fund via email at:

auditcommitteechair@northviewfund.com.

Effective as of March 16, 2021