

TRILINC GLOBAL IMPACT FUND, LLC

Whistleblower Policy and Procedures

Implementation Date: January 13, 2013

Amendment Dates: February 23, 2014

March 22, 2018

I. Policy

TriLinc Global Impact Fund, LLC (the “Fund”) is committed to high business and ethical standards. In line with this commitment, the Board of Managers of the Fund (the “Board” and each member thereof, a “Manager”) has established the following Whistleblower Policy and Procedures for:

- receipt, retention and treatment of any concerns, issues or complaints (collectively “Concerns”) regarding: (1) accounting, financial, internal controls, and auditing matters; and (2) legal, compliance or regulatory matters (1 and 2 collectively “Reportable Matters”), and
- submission of Concerns by any employee, service provider or consultant of the Fund (a “Party”) regarding Reportable Matters.

For the avoidance of doubt, nothing in this Manual prohibits employees from reporting potential violations of federal law or regulation to any governmental agency or entity, including but not limited to the Department of Justice, the SEC, or any agency’s inspector general, or from making other disclosures that are protected under the whistleblower provisions of federal law or regulation. Employees do not need prior authorization from their supervisor, the CCO, or any other person or entity affiliated with the Fund to make any such reports or disclosures, and do not need to notify the Fund or any person or entity affiliated with the Fund that they have made such reports or disclosures. Additionally, nothing in this Manual prohibits employees from recovering an award pursuant to a whistleblower program of a government agency or entity.

This Policy is administered by the Fund’s Audit Committee of the Board of Managers.

II. Procedures

Submission of Concerns

Any Party having Concerns may report such Concerns to the Fund’s Chief Financial Officer (the “CFO”) or, if such person is a subject of the concern, to the Chairman of the Audit Committee. Report of Concerns may be submitted in writing or by e-mail, telephone or in-person, at the option of the reporting Party. Reports may be anonymous at the option of the reporting Party. Reporting Parties who are willing to provide their names should indicate if they want their names kept confidential. Any Party may submit Concerns under this Whistleblower Policy through any of the following channels:

By regular mail addressed to:

Mark Tipton
Chief Financial Officer
TriLinc Global Impact Fund, LLC
1230 Rosecrans Avenue, Suite 605
Manhattan Beach, California 90266

The CFO will forward a copy of the letter to the Chairman of the Audit Committee.

On a confidential or anonymous basis by regular mail addressed to:

CONFIDENTIAL
Chairman of the Audit Committee
TriLinc Global Impact Fund, LLC
1230 Rosecrans Avenue, Suite 605
Manhattan Beach, California 90266

The CFO will forward the unopened letter to the Chairman of the Audit Committee.

By e-mail addressed to the Chief Financial Officer at:

mtipton@trilincglobal.com

By telephone to the Chief Financial Officer at:

(310) 220-0872

The letter, e-mail or telephone call (collectively, the “Communication”) should contain as much specific detail as possible to allow for proper assessment. The Communication should be candid and include all of the information that the Party knows regarding the Concerns. To the extent possible, the Communication should include sufficient corroborating information to support the commencement of an investigation. The Company may, in its reasonable discretion determine to not commence an investigation if the Communication contains only unspecified or broad allegations without appropriate support.

Scope of Matters Covered by these Procedures

These procedures relate to Concerns relating to any Reportable Matters including, without limitation, the following:

- fraud or deliberate error in the preparation, evaluation, review or audit of any financial statement of the Fund;
- fraud or deliberate error in the recording and maintaining of financial records of the Fund;
- deficiencies in or noncompliance with the Fund’s internal controls over accounting or financial reporting;
- misrepresentation or false statement to or by an officer, accountant or external auditor regarding a matter contained in the financial records, financial reports or audit reports of the Fund;
- deviation from full and fair reporting of the Fund’s financial condition or results of operations; and
- non-compliance with applicable legal, compliance and regulatory matters.

Treatment of Concerns

Upon receipt of any Communication, the Chairman of the Audit Committee or the CFO, if so designated by the Chairman (each an “Investigating Officer”), shall make a determination, in his or her reasonable judgment, whether a reasonable basis exists for commencing a formal investigation. The determination by the Investigating Officer will be provided to the Party who sent the Communication (unless the communication was sent on an anonymous basis) to the Committee and to relevant management.

If the Investigating Officer determines that a reasonable basis exists for commencing a formal investigation, the Investigating Officer will promptly notify the Audit Committee. The Audit Committee will then determine, in its reasonable judgment, whether to commence a formal investigation. If the Audit Committee decides that a formal investigation is warranted, it will instruct the Investigating Officer to proceed with such formal investigation. The Audit Committee shall ensure coordination of the investigations and shall have overall responsibility for the implementation of this policy. The Audit Committee shall have the authority to retain outside legal, accounting or other relevant expertise in any investigation, as it deems necessary to conduct the investigation in accordance with this policy.

At each meeting of the Board, the CFO shall present a report containing the following information with respect to each Communication received during the quarter: a description of the Communication; whether or not the Communication resulted in the commencement of a formal investigation; and the status of each formal investigation.

Corrective Action

The Board, with the input of the Investigating Officer and Fund management, if requested, will determine the validity of Concerns and the appropriateness of any corrective actions. It is the responsibility of the Audit Committee to assure that the Fund takes appropriate corrective action. Directors, Officers and employees that are found to have materially violated any laws, regulations or Fund policies may be subject to disciplinary action.

No Retaliation

This Policy and Procedures is intended to enable individuals to raise Concerns for investigation and appropriate action. With this goal in mind, consistent with the policies of the Fund, the Audit Committee and CFO shall not retaliate or tolerate any retaliation by Managers or Officers of the Fund directly or indirectly, including encouraging retaliation by others, against anyone who, in good faith, makes a report of a Concern or provides assistance to the Audit Committee, management or any other duly authorized person or group, including any governmental, regulatory or law enforcement body, investigating a report of a Concern. If the CFO or Chairman of the Audit Committee becomes aware of a retaliatory action against a reporting person, the CFO or Chairman of the Audit Committee shall inform the Board of such action.

Nothing in this Policy and Procedures shall limit the authority of the Fund to discipline, penalize, suspend or terminate any employee for good and sufficient reasons, which reasons shall not include having in good faith made a report of a Concern or provided assistance to the Audit Committee, management or any other duly authorized person or group, including any governmental, regulatory or law enforcement body, investigating such report. A person's right to protection from retaliation does not extend immunity for any complicity in the matters that are the subject of the Concerns or any ensuing investigation.

Confidentiality

Reports of Concerns, and investigations pertaining thereto, shall be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. The CFO or Chairman of the Audit Committee shall take reasonable steps necessary to protect the identity of any person making a report of a Concern so as to prevent any officer, employee, contractor, sub-contractor or agent from being in a position to take any retaliatory action against such person making such report, including encouraging

others to take retaliatory action. In no event will information be released to persons without a specific need to know about the Communication.

Retention of Complaints and Documents

The CFO will maintain a log of all Communications, tracking their receipt, investigation and resolution. All Communications will remain confidential to the extent possible. All documents relating to the Communications and the investigations shall be maintained for a minimum of six years.