



Whistleblower Policy



The Company is committed to conducting all of its operations and activities in a manner that best exemplifies the highest standards of honesty, integrity, ethics, and that encourages and promotes compliance with all governing law. Therefore, it is the policy of the Company not only to encourage but also to require covered persons to immediately report and “blow the whistle” on any perceived violation of Company policy or illegal activity affecting any covered person, the Company or its operations.

Whistleblower Defined

A whistleblower is any person who makes an internal or external report of acts or omissions affecting the Company, its employees, or those we serve that the whistleblower reasonably and in good faith believes to be a violation of Company policy or illegal.

Duty to Report Policy Violations or Illegal Activity

If a covered person has knowledge of a policy violation or illegal activity, or if he or she is asked by anyone associated with his or her employment or service to the Company, (including without limitation a coworker, supervisor, manager, customer, or vendor) to engage in any such activity, the covered person must immediately report it to his or her supervisor, or any other member of management, or the employee can contact the Company’s Ethics Hotline. The contact information for the Company’s Ethics Hotline can be found in the “Reporting Violations and Investigations” section of this handbook. The Company also will respond promptly to reports of wrongdoing that are made based on information known by the reporter to be false.

Investigation and Corrective Action

The Company takes each report of a potential policy violation or illegal activity very seriously and will promptly and thoroughly investigate each report. The whistleblower is not responsible for investigating the activity or for determining fault or corrective measures, and the alleged violator or violators will not take part in any investigation or determination of corrective action. Swift corrective action will be taken as warranted by the results of the investigation.

Whistleblower Protections and Prohibition against Retaliation

The Company will not tolerate any form of retaliation against a whistleblower and will take all reasonable actions to protect whistleblowers from retaliation. The Company will maintain the confidentiality of the whistleblower to the maximum extent possible. However, limited disclosure may be necessary in some cases in order to conduct a thorough investigation or to comply with applicable law.

Any whistleblower who believes retaliation is occurring must immediately report it to the Legal Department. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and documented through an investigation.