

VEHI Whistle Blower Policy

This policy shall endeavor to protect any member of the Board of Directors, officer (which for purposes of this policy shall include but not be limited to corporate officers and trust administrators), volunteer or intern who provides services to VEHI, from intimidation, harassment, discrimination or other forms of retaliation on the part of VEHI, or any of the members of the Board of Directors, officers, volunteers or interns, as a consequence of the good faith filing of a report relative to suspected violations of any statute, regulation, applicable ethical standard, or policy or procedure of VEHI. In the event that VEHI employs any individuals, this policy shall apply to such individuals.

1. Purpose and Action Required.

The Board of Directors and officers of VEHI are committed to established legal standards of fiduciary conduct while ensuring a workplace environment that promotes openness, fairness, productivity and teamwork. This policy is implemented to protect the members of VEHI's Board of Directors, and its officers, volunteers and interns from reprisals when they, in good faith, report information regarding suspected violations of any statute, regulation, applicable ethical standard, or policy or procedure of VEHI.

If any member of the Board of Directors, officer, volunteer or intern reasonably believes that some policy, practice, or activity of VEHI, or of another individual or entity with whom VEHI has a substantial business relationship [i.e., exceeding Ten Thousand Dollars (\$10,000)], may violate any statute, regulation, ethical standard or policy or procedure applicable to VEHI, the individual should file a written report summarizing his/her concerns. In order for reports to be handled promptly and efficiently, individuals should file such reports with the President; in the event that the report directly involves the President, then the report should be filed with the Chair of the Board of Directors. These written reports will be maintained as confidential, kept securely, and will only be shared with individuals who have a legitimate interest in the information.

2. Investigation and Resolution.

The investigation of any alleged misconduct or omission governed by this policy shall be conducted in the following manner:

- a. Upon receipt of the written report, the President shall head the investigation. If the report involves the President, then the Chair of the Board of Directors shall head the investigation. The investigative representative shall:

- i. Maintain the confidentiality of the reporter and the subject members of the Board of Directors, officers, volunteers or interns of VEHI, the existence of the alleged misconduct or omission, and the underlying factual circumstances of the filing of the written report, except as needed to properly investigate the matter;
 - ii. Determine the appropriate scope and form of the investigation of the written report in the context of the allegations made therein, the individuals involved and the policies and procedures of VEHI. As appropriate, the investigative representative shall make initial inquiries as soon as possible, and provide a report (oral or written) on the initial inquiries, or the recommended scope and form of the investigation, to the Board of Directors. A recommendation may be made to the Board of Directors that the written report that initiated the investigation be resolved by the initial inquiry if the allegations appear clearly unfounded, without need for further investigation; and
 - iii. As applicable, prepare and submit a written report on the matter to the Board of Directors as soon as practicable, but no later than forty-five (45) days after the initial report.
- b. The investigative representative shall submit the report, an assessment and recommended action(s), if any, with specific time frames, to the Board of Directors; and the Board of Directors, at its next scheduled meeting, or at a special meeting called for that purpose, shall consider the matter and render binding determinations as to resolution.

3. Contact With and Information to Reporter.

The amount of contact between the reporter and the investigator will depend on the nature of the issue and the clarity of information provided. Further information may be sought from the reporter, if he or she is known. The reporter, if known, will be given the opportunity to receive follow up on his/her concern within two weeks of the initial report. This follow up includes, but is not limited to:

- Acknowledgement that the concern was received;
- Indication as to how the matter is being investigated;
- An estimate of the time that it will take for a final response;

4. Anonymous Allegations.

Reporters are strongly encouraged to include their names in the reports because appropriate follow up questions and investigation may not be possible unless the source of the information is identified. Concerns expressed anonymously will be investigated, but consideration will be given to:

- The seriousness of the issue raised;
- The credibility of the concern; and
- The likelihood of being able to investigate the allegation from documentation and/or other sources.

Every effort will be made to protect the reporter's identity; however, all individuals considering such a report should be advised that anonymity cannot be assured if an external investigation or criminal proceedings related to the report occur.

5. Harassment or Victimization.

A reporter, who in good faith reports suspected violations pursuant to the terms of this policy, shall not suffer retaliation, discrimination, or harassment. A member of the Board of Directors, officer, volunteer or intern who retaliates against someone who has reported suspected violations in good faith will be disciplined. This policy is intended to encourage and enable a member of the Board of Directors, officer, volunteer or intern to raise serious concerns within VEHI prior to seeking resolution outside VEHI. In addition, the provision of such information shall not in any way influence, positively or negatively, the implementation of any feedback processes that VEHI has in place from time to time.

6. Documentation.

The Board of Directors shall assure that at all stages the matter is properly documented in the records of VEHI, including any minutes of the Board of Directors where the matter was considered and/or addressed, paying particular attention to the confidentiality outlined in this policy.

7. Malicious Allegations.

The Board of Directors recognizes that intentionally untruthful, malicious, erroneous or bad faith allegations would be damaging to the mission, integrity and morale of VEHI, as well as the reputations of the Board of Directors members, officers, volunteers or interns. The safeguards

stated in this policy do not apply to individuals who make such complaints. Such allegations may result in disciplinary action.

All members of the Board of Directors, officers, volunteers and interns are expected to follow the procedures outlined in this policy and cooperate with any investigation initiated pursuant to this policy. VEHI must have the opportunity to investigate and remedy any suspected violations.

8. Publication.

A copy of this policy shall be distributed to all members of the Board of Directors, officers, volunteers and interns who provide services to VEHI.

Adopted: September 25, 2017