

Whistleblower Policy

November 18, 2009

Purpose

The entity expects its board of directors, employees, and other representatives to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the entity, we must practice honesty and integrity in fulfilling our responsibilities and comply with applicable laws and regulations. It is the responsibility of all directors, and employees to report Wrongful Conduct in accordance with this Whistleblower Policy.

Definition of “wrongful conduct is; to include any serious violation of the entity’s policy; a violation of applicable state and federal law; or the use of the entity’s property, resources or authority for personal gain or other non organization-related purpose except as provided under the entity’s policy.

This definition of Wrongful Conduct is not intended to be an exclusive listing of the illegal or improper activity encompassed by the Whistleblower Policy. Rather, the Whistleblower Policy is intended to serve as a means for reporting all serious improprieties that potentially impact the integrity and effective operation of the entity.

No Retaliation

No director or employee who in good faith reports Wrongful Conduct will suffer harassment, retaliation or adverse employment consequence. Any director or employee who retaliates against anyone who has reported Wrongful Conduct in good faith is subject to discipline up to and including termination of employment or removal from the board of directors as applicable. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within the entity prior to seeking resolution outside the entity.

Reporting Wrongful Conduct

The entity encourages its directors and employees to share their questions, concerns, suggestions, or complaints with someone who can address them properly. Any director or employee may report Wrongful Conduct to the President/CEO. If the Wrongful Conduct implicates one or both the President/CEO or the Chairperson of the board of directors, or if the reporting individual is not comfortable speaking with or not satisfied with the response of the foregoing individuals, the issue may be reported to the Vice Chairperson of the board or the Treasurer of the board. The President/CEO, Chairperson of the board of directors, Vice Chairperson or Treasurer to whom a Wrongful Conduct accusation is made are required to advise the full board of directors of such report of Wrongful Conduct.

