

WEConnect International Whistleblower Policy

May 20, 2020

1. PURPOSE OF WHISTLEBLOWER POLICY

WEConnect is committed to high standards of ethical, moral and legal business conduct. In line with this commitment, and WEConnect's commitment to open communication, this policy aims to provide an avenue for raising concerns and reassurance that those raising concerns will be protected from reprisals or victimization for whistleblowing.

2. DEFINITIONS

41 U.S.C. § 4712 states that an employee of a Grantee may not be discharged, demoted, or otherwise discriminated against as a reprisal for "whistleblowing." In addition, whistleblower protections cannot be waived by any agreement, policy, form, or condition of employment.

Whistleblowing is defined as making a disclosure "that the employee, contractors, volunteers, or directors believe" is evidence of any of the following:

- Incorrect financial reporting
- Unlawful activity
- Activities that are not in line with the Code of Business Conduct
- Activities, which otherwise amount to serious improper conduct
- Gross mismanagement of a Federal contract or grant;
- A gross waste of Federal funds;
- An abuse of authority relating to a Federal contract or grant;
- A substantial and specific danger to public health or safety; or
- A violation of law, rule, or regulation related to a Federal contract or grant (including the competition for, or negotiation of, a contract or grant).

To qualify under the statute, the employee's disclosure must be made to:

- A Member of the U.S. Congress, or a representative of a U.S. Congressional Committee;
- A cognizant U.S. Inspector General;
- The U.S. Government Accountability Office;
- A Federal employee responsible for contract or grant oversight or management at the relevant agency;
- A U.S. court or grand jury; or,
- A management official or other employee of the Grantee who has the responsibility to investigate, discover, or address misconduct.

3. SCOPE

This policy applies to all WEConnect officers, employees, contractors, volunteers and directors.

4. RESPONSIBLE PARTIES FOR THE POLICY

It is the responsibility of all WEConnect directors, officers, employees, contractors and volunteers to report concerns about violations of WEConnect's code of ethics or suspected violations of law or regulations that govern WEConnect's operations.

5. GUIDELINES

Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense. Confidentiality Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

This policy encourages employees to put their names to allegations because appropriate follow-up questions and investigation may not be possible unless the source of the information is identified. Concerns expressed anonymously will be explored appropriately, but consideration will be given to:

- The seriousness of the issue raised
- The credibility of the concern
- The likelihood of confirming the allegation from attributable sources

6. PROCEDURE

The process for raising a concern is:

- Step 1: Employees are strongly encouraged to discuss work-related issues with their supervisor. Managers should make every effort to achieve a satisfactory solution promptly. In the event of a non-employee, the party may directly proceed to step 2 or step 3.
- Step 2: If the employee's discussion with his or her supervisor fails to reach a resolution of the problem, the employee is encouraged to discuss the complaint or problem with the CEO and outline his or her recommended solution to the problem. The CEO will gather all relevant facts, review policies and procedures, and consult with others as necessary in order to achieve an appropriate solution as quickly as possible.
- Step 3: If the problem is still not resolved to the satisfaction of the employee, he or she will state in writing his or her version of the facts and the desired outcome, and request review by the Executive Board of Directors within 30 days.

Although there are no specific time limits set for each of the steps described above, the Company encourages all parties to act with reasonable speed so that decisions can be reached promptly. There will be no retaliation taken for using this procedure

7. EXCEPTIONS

None