STRONGWARD WHISTLEBLOWER POLICY

PURPOSE

The purpose of this policy is to empower those with knowledge of unethical, fraudulent, or unlawful behavior to make such known to Strongward leadership immediately. POLICY Strongward, Inc. requires directors, officers, and employees to comply with all applicable laws and regulations and maintain high standards of business and personal ethics. It is Strongward's policy to prevent unethical, fraudulent, or unlawful behavior, discontinue such behavior immediately upon discovery, and discipline those who violate any applicable laws, regulations, or our standards. Any knowledge of such wrongdoing or potential wrongdoing shall be reported immediately.

YOUR COMMITMENT

1. Reporting Responsibility: If a director, officer, or employee of Strongward is aware of unethical, fraudulent, or unlawful behavior by Strongward, or any director, officer, or employee of Strongward, that individual has a responsibility to report such conduct as described below.
2. Requirement of Good Faith: Anyone filing a complaint must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of this Policy and/or applicable law.

STRONGWARD'S COMMITMENT

1. No Retaliation: No one who in good faith reports a suspected violation shall suffer harassment, retaliation or adverse employment consequence. A director, officer, or employee who retaliates against someone who has reported a suspected violation in good faith is subject to discipline up to and including termination. The protection from retaliation is not intended to prohibit supervisors from taking action, including disciplinary action, in the usual scope of their duties and based on valid performance-related factors.
2. Confidentiality: Suspected violations may be submitted on a confidential basis by the complainant. Reports of suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation and take appropriate disciplinary action.
3. Handling Suspected Violations: The person responsible for carrying out the investigation of a suspected violation will acknowledge receipt of the report within five (5) business days. All reports will be promptly investigated, and appropriate corrective action, up to and including termination, will be taken if warranted by the investigation.

PROCEDURES

The Chief Executive Officer (CEO) of Strongward is responsible for investigating and resolving all complaints and allegations concerning suspected violations of this policy. Any suspected violations of this policy should be made in writing to the CEO. Should the CEO be the subject of any complaint, then the Chairperson of the Board of Directors of Strongward, Inc. shall receive any such complaint and shall be responsible for the investigation thereof.

Should the Chairperson of the Board be the subject of any such complaint, then the complaint shall be presented to the Chief Executive Officer (CEO), who shall have an obligation to refer the matter to outside legal counsel and/or to Strongward's financial auditors for appropriate review and investigation.

Should the CEO of Strongward, or, where applicable, the Chairperson of the Board, determine that the conduct complained of does not fall within the ambit of this Policy, the CEO and/or Chairperson may, as warranted, refer the complaint to the Director of Human Resources for review and investigation pursuant to Strongward's grievance procedures as set forth in the Employee Handbook.

To the extent that any alleged misconduct concerns Strongward's AmeriCorps grant, reports can be made to the OIG hotline at 1-800-452-8210.

STRONGWARD

LONG-TERM DISASTER RECOVERY