



Lifeguard
Solutions

WHISTLEBLOWER PROTECTION POLICY

1. EFFECTIVE DATE.

This Lifeguard Solutions whistleblower protection policy is made and effective as of January 15, 2016. It was last updated on September 5, 2018.

2. PURPOSE.

Lifeguard Solutions wants its employees to feel free to report good faith concerns about unlawful activities in the workplace, including unlawful conduct by other associates, unsafe working conditions, and unfair labor practices. All employees, including board members, staff, and executives, should know that they will not face retaliation for violations reported according to this policy.

3. REPORTING VIOLATIONS.

To report suspected violations, please write, email, or call one of the following resources:

(a) **Compliance Officers.** Compliance officers are individuals who are responsible for reviewing and investigating reported violations. Lifeguard Solutions has appointed the following associates to serve as compliance officers. Suspected violations can be reported to one of the following compliance officers:

(i) Michael Bower, CEO, michael.bower@lifeguardsolutions.io

(b) **Alternative Reporting Options.** If you feel uncomfortable reporting suspected violations to one of the compliance officers, or feel that your report has not been addressed properly, contact the Lifeguard Solutions Advisory Board.

4. ANONYMOUS REPORTS.

(a) Reporters seeking 100% anonymity should report suspected violations by letter with no identifying details to the Lifeguard Solutions Advisory Board.

- (b) Although Lifeguard Solutions will use its best efforts to maintain the anonymity of reporters, in certain cases an individual's identity may need to be disclosed to conduct a thorough investigation, to comply with the law, or to provide accused individuals their legal rights of defense.

5. CONTENTS OF REPORT.

In general, a report should contain as much information as possible, including the facts and dates that led you to suspect that a violation occurred. Although you are not required to give your name in your report, contact information will allow the compliance officer to follow up with you with further questions.

6. ANONYMITY AND CONFIDENTIALITY.

Regardless of the method you use to report suspected violations, Lifeguard Solutions will make every effort to keep your report confidential. However, the degree of anonymity possible will depend on the reporting method you choose. For example, if you report a suspected violation by telephone, the compliance officer may recognize your voice. Please select the reporting method that supports your desired level of anonymity.

7. INVESTIGATING AND RESOLVING REPORTS.

- (a) **Documentation.** When a report is received, the compliance officer will create a file for the suspected violation, and will keep all documentation in that file.
- (b) **Timeframe.** Investigation of violations shall begin within 3 days of receipt of the report. Every effort shall be made to investigate and resolve reports promptly.

8. COMPLIANCE OFFICERS' DUTIES.

Compliance officers shall use their best efforts to investigate thoroughly and with consideration for the reporter all reports of suspected violations. Compliance officers must report annually on the submission and resolution of these matters to the Lifeguard Solutions Advisory Board

9. CONFIRMATION.

If your report is not anonymous, the compliance officer will notify you that your report has been received and keep you updated on the status and results of the investigation.

10. GOOD FAITH.

Lifeguard Solutions encourages all of its associates to report workplace conduct that they believe violates applicable laws and regulations. Lifeguard Solutions may take disciplinary actions against associates who make unfounded allegations proved to have been falsely or maliciously made.

11. NO RETALIATION.

Lifeguard Solutions will not tolerate retaliation against associates who report violations pursuant to this policy. Good faith reporters can be assured that no matter the investigation's outcome, they will not face adverse employment consequences, discrimination, harassment, or threats as a result of their reports. A whistleblower who believes that he or she is being retaliated against must contact the Chief Executive Officer, Michael Bower at michael.bower@lifeguardsolutions.io. A whistleblower's entitlement to protection against retaliation does not include immunity for personal wrongdoing that is alleged and investigated.

12. OTHER LAW.

Nothing in this policy may be construed in a way that conflicts with any reporting obligations or protections afforded by state or federal law.