

WHISTLEBLOWER PROTECTION POLICY

1. EFFECTIVE DATE.

This Whistleblower Protection Policy is made and effective as of June 5th, 2013.

2. PURPOSE.

Marine Reconnaissance Foundation 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, [and volunteers,] 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. The Marine Reconnaissance Foundation has appointed the following associates to serve as compliance officers. Suspected violations can be reported to one of the following compliance officers:

- (i) Executive Vice President of Legal affairs, **Simon Willman**, simon.willman@gmail.com

- (b) Alternative Reporting Options. If you feel uncomfortable reporting suspected violations to our compliance officer, or you feel that your report has not been addressed properly, contact the Chief Executive Officer at david.c.danel@reconfoundation.org

4. ANONYMOUS REPORTS.

Reporters seeking 100% anonymity should [either use the anonymous hotline or] report suspected violations by letter with no identifying details.

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, the Marine Reconnaissance Foundation 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 15 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 board][the audit committee][the financial committee].

9. CONFIRMATION.

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

10. GOOD FAITH.

The Marine Reconnaissance Foundation encourages all of its associates to report workplace conduct that they believe violates applicable laws and regulations. The Marine Reconnaissance Foundation reserves the right to take disciplinary actions against associates who make unfounded allegations proved to have been falsely or maliciously made.

11. NO RETALIATION.

The Marine Reconnaissance Foundation 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.

12. OTHER LAW.

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