

# Whistleblower Protection Policy

## General

RevAULusion requires that its Directors, Officers and employees observe high standards of business and personal ethics in the conduct of the Organization's mission and business, as well as their individual duties and responsibilities. These standards are described in RevAULusion's Code of Ethical and Professional Conduct. As employees and representatives of RevAULusion, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

## Reporting Responsibility

It is the responsibility of all Directors, Officers and employees to comply with RevAULusion's Standards of business and personal ethics and to report violations or suspected Violations thereof in accordance with this Whistleblower Protection Policy.

## No Retaliation

No Director, Officer or employee who in good faith reports a violation shall suffer harassment, retaliation or adverse employment consequence based on said reporting. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower Protection Policy is intended to encourage and enable employees and others to raise good faith serious concerns within RevAULusion prior to seeking resolution outside of the Organization.

## Reporting Violations

If you have good faith questions, concerns, suggestions or complaints about RevAULusion's business operations or ethics, or the conduct of any Director, manager, supervisor, or employee, you are encouraged to bring those issues to someone who can address them properly. In most cases, your supervisor or manager is in the best position to address an area of concern. However, if you are not comfortable speaking with your supervisor or manager, or you are not satisfied with your supervisor's or manager's response, you are encouraged to speak with someone in the Human Resources Department or any other member of the management team. If you are not

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Comfortable approaching anyone on the management team or in the Human Resources Department, you are asked to direct your concerns to one of the RevAULusion Board of Directors, who may be contacted confidentially via U.S. Postal Service, addressed: RevAULusion Board of Directors, HR Committee, **CONFIDENTIAL**, 10730 Potranco Rd, Suite 122-212, San Antonio, TX 78253.

Supervisors and managers are required to report complaints or suspected violations to the Chief Executive Officer within 48 hours of receipt of the complaint or discovery of the Suspected violation. If the supervisor or manager prefers, the report can be made Directly to a member of the Board of Directors within the 48-hour time frame.

## **Accounting and Auditing Matters**

The Audit|Compliance Committee of the Board of Directors shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. In addition to the aforementioned reporting procedure, if you have any concerns regarding RevAULusion accounting practices, internal controls or auditing, you are asked to bring those concerns directly to a member of the audit committee of the Board of Directors, who may be contacted confidentially via U.S.P.S., addressed: RevAULusion Board of Directors, Audit|Compliance Committee, **CONFIDENTIAL**, 10730 Potranco Rd., Suite 122-212, San Antonio, TX 78253

## **Acting in Good Faith**

Anyone filing a complaint concerning a violation or suspected violation of RevAULusion's standards of business and personal ethics 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 offense, which could result in discipline up to and including termination of employment or termination of the Director relationship with RevAULusion.

## **Confidentiality**

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. If you wish to submit your complaint confidentially, you may so indicate to a supervisor, manager, or Director through the aforementioned reporting procedure. If you wish to

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submit your complaint anonymously, you may do so by providing your complaint anonymously in writing and submitting it to a supervisor, manager, or Director. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

## Handling of Reported Violations

Unless submitted anonymously, the supervisor, manager, or Director to whom the complaint has been made, either orally or in writing, will acknowledge receipt of the reported or suspected violation within five business days. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation. The Complainant will be notified upon completion of the investigation. If the Complainant is not satisfied with RevAULusion's handling of the complaint, he or she may file a complaint with the appropriate external agency.

My signature below indicates my receipt and understanding of this policy. I also verify that I have been provided with an opportunity to ask questions about the policy.

\_\_\_\_\_  
Employee Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Print Name