

Human Life International  
Whistleblower Policy  
Adopted: September 11, 2018

WHEREAS, the Human Life International, Inc. (HLI) Board of Directors seeks to establish a Whistleblower Policy (Policy) to create a process for an employee of HLI to report an activity that he/she considers to be illegal, dishonest, or gravely immoral. The whistleblower is not responsible for investigating the activity or for determining fault or corrective measures; appropriate management officials are charged with these responsibilities.

WHEREAS, examples of illegal, dishonest, or gravely immoral activities include, but are not limited to, violations of federal, state, or local laws, billing for services not performed or for goods not delivered, other fraudulent financial reporting, and/or actions considered as harassment, abuse, and/or immoral, including but not limited to financial, virtual, verbal, emotional, psychological, physical, and/or sexual harassment, abuse, and/or immorality.

IT IS THEREFORE RESOLVED THAT the HLI Board of Directors adopts the following policy:

If an employee has knowledge of or a concern of illegal, dishonest, or gravely immoral activity, the employee is to contact his/her immediate supervisor or the Executive Vice President. The employee must exercise sound judgment to avoid baseless allegations. An employee who intentionally files a false report of wrongdoing will be subject to discipline up to and including termination.

Whistleblower protections are provided in two important areas – confidentiality and against retaliation. The confidentiality of the whistleblower will be maintained. In the event identity may have to be disclosed to conduct a thorough investigation, to comply with the law and to provide accused individuals their legal rights of defense, the whistleblower shall be so advised. HLI will not retaliate against a whistleblower. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, or poor work assignments and threats of physical harm. Any whistleblower who believes he/she is being retaliated against must contact the Executive Vice President immediately. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

Defend Trade Secrets Act (DTSA) Compliance: "Immunity from Liability for Confidential Disclosure of a Trade Secret to the Government or in a Court Filing:

(1) Immunity—An individual shall not be held criminally or civilly liable under any federal or state trade secret law for the disclosure of a trade secret that

(A) is made

- a. in confidence to a federal, state or local government official, either directly or indirectly, or to an attorney; and

- b. solely for the purpose of reporting or investigating a suspected violation of law; or
- (B) is made in a complaint or other document filed in a lawsuit or other proceeding, if such filing is made under seal.

(2) Use of Trade Secret Information in Anti-Retaliation Lawsuit—An individual who files a lawsuit for retaliation by an employer for reporting a suspected violation of law may disclose the trade secret to the attorney of the individual and use the trade secret information in the court proceeding, if the individual

(A) files any document containing the trade secret under seal; and

(B) does not disclose the trade secret, except pursuant to court order."

All reports of illegal, dishonest, or gravely immoral activities will be promptly submitted to the Executive Vice President who is responsible for investigating and coordinating corrective action. All reports shall be brought to the attention of the Chairman of the Board and referred to the Governance Committee for attention. If the conduct in question relates directly to the Executive Staff, the matter is to be related to the Chairman of the Board.

Employees with any questions regarding this policy should contact the Executive Vice President.