



Ruritan National

Whistleblower Protection Policy

Ruritan National's Code of Ethics and Conduct ("Code") requires directors, officers, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Employees and representatives of Ruritan National are required to practice honesty and integrity in the discharge of their duty, and to comply with all applicable laws and regulations.

It is the responsibility of all directors, officers and employees to comply with the Code and to report violations or suspected violations in accordance with this Whistleblower Policy.

No director, officer, or employee who in good faith reports a violation of the Code shall suffer harassment, retaliation, or adverse employment consequence. 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 Policy is intended to encourage and enable employees and others to raise serious concerns within Ruritan National prior to seeking resolution outside Ruritan National.

It is the intent of Ruritan National to adhere to all laws and regulations that apply to the organization and the underlying purpose of this policy is to support the organization's goal of legal compliance. The support of all employees is necessary to achieving compliance with various laws and regulations. An employee is protected from retaliation only if the employee brings the alleged unlawful activity, policy, or practice to the attention of Ruritan National and provides Ruritan National with a reasonable opportunity to investigate and correct the alleged unlawful activity. The protection described below is only available to employees that comply with this requirement.

Ruritan National will not retaliate against an employee who in good faith, has made a protest or raised a complaint against some practice of Ruritan National or of another individual or entity with whom Ruritan National has a business relationship, on the basis of a reasonable belief that the practice is in violation of law, or a clear mandate of public policy.

Ruritan National will not retaliate against employees who disclose or threaten to disclose any activity, policy, or practice of Ruritan National that the employee reasonably believes

is in violation of a law, rule, or regulation mandated pursuant to law or is in violation of a clear mandate or public policy concerning the health, safety, welfare, or protection of the environment.

If any employee reasonably believes that some policy, practice, or activity of Ruritan National is in violation of law, a written complaint must be filed by that employee with the Executive Director or the Board President.

The Code addresses Ruritan National's open door policy and suggests that employees share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an employee's immediate supervisor is in the best position to address an area of concern. If the employee is not comfortable speaking with their immediate supervisor or is not satisfied with the supervisor's response, then the employee is encouraged to speak with anyone in management that they are comfortable in approaching. Supervisors and managers are required to report suspected violations of the Code of Conduct to the Executive Director of Ruritan National, who has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or when you are not satisfied or uncomfortable with following Ruritan National's open door policy, individuals should contact the Executive Director of Ruritan National directly.

Ruritan National's Executive Director is responsible for investigating and resolving all reported complaints and allegations concerning violations of the Code and, at his discretion, shall advise senior management and/or the Executive Committee committee. The Executive Director has direct access to the Executive Committee of the Board of Directors.

The Budget and Finance Committee of the Board of Directors shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Executive Director or Executive Committee shall immediately notify the Budget and Finance Committee of any such complaint and work with the committee until the matter is resolved.

Anyone filing a complaint concerning a violation or suspected violation of the Code must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Code. 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 disciplinary offense.

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation and appropriate corrective action will be taken if warranted by the investigation.