

Whistleblower Policy

It is the responsibility of all directors, officers, and employees of Ben's Lighthouse ("BLH") to comply with the Code of Conduct, all Company Policies and to report violations or suspected violations in accordance with this Whistleblower Policy.

No Retaliation

No director, officer, or employee who in good faith reports a violation of the Code of Conduct or any other Policy 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 or Board of Director membership. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within the organization prior to seeking resolution outside the organization.

Reporting Violations

As a first step, and when appropriate, employees should share their questions, concerns, suggestions, or complaints with someone who can address them properly. In most cases, an employee's supervisor is in the best position to address an area of concern. However, if you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with the Board Chair, Treasurer or Company Secretary. Supervisors are required to report suspected violations of the Code of Conduct or any other Policy to the Board Chair or Treasurer, who has specific and exclusive responsibility to investigate all reported violations.

Governance Committee Compliance Responsibility

The BLH Governance Committee is responsible for investigating and resolving all reported complaints and allegations concerning violations of the Code of Conduct or any Company Policy.

Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation of the Code of Conduct or any other Policy 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.

Confidentiality

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.

Handling of Reported Violations

The Governance Committee will notify the sender and acknowledge receipt of the reported violation or suspected violation within 5 business days. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation. The

Governance Committee, at its option, may engage legal counsel or a special investigator to assist in evaluating the reported violation.

A copy of this Whistleblower policy shall be furnished to each director, officer and staff member who is presently serving this organization or who may become associated with it and should be maintained on BLH website.