

## OLDWAYS PRESERVATION AND EXCHANGE TRUST, INC.

### WHISTLEBLOWER POLICY

#### POLICY:

Directors, officers, employees and volunteers of the Corporation are encouraged to report any improper activity to the President. Improper activities are defined as any activity that may jeopardize the accuracy of financial reporting, is a conflict of interest, indicates a misappropriation of assets, or otherwise is illegal or violates organizational policies or ethical standards. Directors, officers, employees and volunteers will not be retaliated against for whistle blowing.

#### PURPOSE:

In compliance with the Sarbanes-Oxley Act's goals of improving corporate governance and responsibility, the purpose of this policy is to encourage and enable individuals to come forward as soon as possible if they have credible information regarding an illegal practice, a violation of organizational policies, or a violation of ethical standards.

#### POLICY GUIDELINES:

**1. Reporting Improper Activities.** Any director, officer, employee or volunteer who has a good faith concern regarding any improper activity, including the legality or propriety of any action taken or contemplated to be taken by the Corporation, or a good faith belief that action needs to be taken for the Corporation to be in compliance with laws, organizational policies or ethical standards, should promptly report such concern to the President (in person, via telephone, e-mail or written communication).

Here and throughout, if the President is a subject of a whistle blower's concern, the process set forth in this policy is to be headed by the Vice President or such other person designated by the Board of Directors.

At a minimum, the following information should be provided.

- Description of the nature of the improper activity
- Names(s) of the person(s) engaging in the activity
- Approximate or actual date the activity took place

The report may be submitted on a confidential basis or may be submitted anonymously. The privacy of those who in good faith report apparent misconduct will be protected to the extent possible consistent with the Corporation's interest in taking appropriate action.

**2. Preliminary Investigation.** Within 30 days of receipt of any whistleblower information, the President of the Corporation will complete a preliminary investigation to establish

the validity of the reported activities. The President or his or her designee will document and maintain secured records of all reported activities and any documentation relating to the investigation of those activities. Legal counsel, accounting assistance, or law enforcement agencies will be contacted if appropriate. Corrective action may be taken as appropriate.

**3. Report to Full Board.** Upon completion of the preliminary investigation, the President will forward the issue to the Board of Directors for their review and appropriate action. The President will supply the Board with the following:

- A copy of the original information provided by the Whistleblower
- A report on the findings of the preliminary investigation and of any action taken, including the President's opinion of the reported activity

Further action may include requesting additional investigative work by any Board or Committee member, questioning senior management, contacting legal counsel or reporting to law enforcement agencies.

## **WHISTLEBLOWER PROTECTION FROM RETALIATION**

It is the Corporation's policy and commitment that a director, officer, employee or volunteer will not be retaliated against for whistle blowing done in good faith. If a director, officer, employee or volunteer believes that he or she has been retaliated against, he or she should contact the President. The Corporation will investigate the alleged retaliation. If the investigation confirms that the a director, officer, employee or volunteer was retaliated against because of his or her whistle blowing, the Corporation will take appropriate corrective actions. Any director, officer, employee or volunteer who threatens, harasses or otherwise retaliates against a person making such a good-faith report will be subject to appropriate discipline, up to and including termination of employment or other remedies.

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