

Bay Aging Whistleblower Policy

REPORTING RESPONSIBILITY: Bay Aging (BA) 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 the Agency must practice honesty and integrity in fulfilling their responsibilities and comply with all BA policies and procedures and all laws and regulations applicable to BA. When reporting believed violations of BA policies and procedures or applicable laws and regulations, employees must follow the Problem Resolution Procedure in the Bay Aging Employee Handbook prior to contacting the Compliance Officer. Board Directors are encouraged to contact the Compliance Officer or the Board Chairman. The Compliance Officer is the Director, Human Resources.

NO RETALITION: No director, officer, or employee who in good faith reports a violation shall suffer harassment, retaliation, or adverse 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. A director or officer is subject to discipline up to and including removal. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within the Agency prior to seeking resolution outside the Agency.

ACTING IN GOOD FAITH: Anyone filing a complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove to have been made maliciously or knowingly false will be viewed as a serious disciplinary offense and could result in termination of employment or other disciplinary action. Once a complaint has been filed, a decision on the complaint must be returned within two weeks.

COMPLIANCE OFFICER: Bay Aging's Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning violations and as appropriate shall advise the President/CEO. If there is a conflict with the President/CEO, the Compliance Officer has direct access to the Executive Committee of the Board of Directors and is required to report to the Executive Committee at least annually on compliance activity. Bay Aging's Compliance Officer is the Director, Human Resources.