



Elevate Phoenix WHISTLEBLOWER POLICY, 9/5/2014

Purpose

ELEVATE PHOENIX is committed to high standards of ethical, moral and legal business conduct. In line with this commitment, and ELEVATE PHOENIX's commitment to open communication, this policy aims to provide an avenue for employees to raise concerns and reassurance that they will be protected from reprisals or victimization for whistleblowing.

This whistleblowing policy is intended to cover protections for you if you raise concerns regarding ELEVATE PHOENIX, such as concerns regarding:

- Incorrect financial reporting;
- Unlawful activity;
- Activities that are not in line with ELEVATE PHOENIX policy, including the Code of Business Conduct; or
- Activities, which otherwise amount to serious improper conduct.

Safeguards

Harassment or Victimization - Harassment or victimization for reporting concerns under this policy will not be tolerated.

Confidentiality - Every effort will be made to treat the complainant's identity with appropriate regard for confidentiality.

Anonymous Allegations - This policy encourages employees to put their names to allegations because appropriate follow-up questions and investigation may not be possible unless the source of the information is identified. Concerns expressed anonymously will be explored appropriately, but consideration will be given to:

- The seriousness of the issue raised;
- The credibility of the concern; and
- The likelihood of confirming the allegation from attributable sources.

Bad Faith Allegations - Allegations in bad faith may result in disciplinary action.

Procedure: 1. Process for Raising a Concern

Reporting- The whistleblowing procedure is intended to be used for serious and sensitive issues. Such concerns, including those relating to financial reporting, unethical or illegal conduct, may be reported directly to: Bob Barbee, Chairman of the Board; or Tim Cleary, Executive Director.

Employment-related concerns should continue to be reported through your normal channels such as your supervisor or to the President and Executive Director.

Timing - The earlier a concern is expressed, the easier it is to take action.

Evidence - Although the employee is not expected to prove the truth of an allegation, the employee should be able to demonstrate to the person contacted that the report is being made in good faith.

Procedure: 2. How the Report of Concern Will be Handled

The action taken by ELEVATE PHOENIX in response to a report of concern under this policy will depend on the nature of the concern. The Audit Committee of the ELEVATE PHOENIX Board of Directors shall receive information on each report of concern and follow-up information on actions taken.

Initial Inquiries - Initial inquiries will be made to determine whether an investigation is appropriate, and the form that it should take. Some concerns may be resolved without the need for investigation.

Further Information -The amount of contact between the complainant and the person or persons investigating the concern will depend on the nature of the issue and the clarity of information provided. Further information may be sought from or provided to the person reporting the concern.