

WHISTLEBLOWER POLICY

The UVIMCO Code of Ethics requires all staff and board members to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Employees and representatives of UVIMCO are expected to practice honesty and integrity in fulfilling their responsibilities and to comply with all applicable laws and regulations. UVIMCO's Whistleblower Policy provides guidelines for reporting good faith concerns about the legality or propriety of all UVIMCO actions and plans.

It is the responsibility of all UVIMCO employees and board members to comply with the Code of Ethics and to report violations or suspected violations in accordance with the Whistleblower Policy.

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

No director, officer or employee who in good faith reports a violation of the Code of Ethics shall suffer harassment, retaliation or adverse employment consequences. 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.

Employees are requested to raise serious concerns within UVIMCO prior to seeking resolution outside the organization. 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.

Employees should file complaints with the individual best suited to address the problem. When appropriate, the employee should first report to his or her supervisor. However if the employee does not feel comfortable or is not satisfied with the response of his or her supervisor, he or she should report to UVIMCO's Compliance Officer. Supervisors are required to report suspected violations to UVIMCO's Compliance Officer, who has specific and exclusive responsibility to investigate and resolve all reported complaints and allegations concerning violations of the Code of Ethics and, at his or her discretion, shall advise the CEO and/or the Audit Committee of the Board of Directors.

The Compliance Officer will acknowledge receipt within five business days of all complaints not submitted anonymously. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation.