

Whistleblower Policy

A whistleblower as defined by this policy is an employee of Haven who reports an activity that he/she considers to be illegal or dishonest to one or more of the parties specified in this Policy. The whistleblower is not responsible for investigating the activity or for determining fault or corrective measures; appropriate management officials are charged with these responsibilities.

Illegal or dishonest activities are:

- (i) Violations of federal, state or local law, rule or regulation committed by an employee or agent of Haven or an independent contractor which creates and presents a substantial and specific danger to the public's health, safety or welfare.
- (ii) Any act or suspected act of gross mismanagement, malfeasance, misfeasance, gross waste of public funds, or gross neglect of duty committed by an employee or agent or independent contractor of Haven.

If an employee has knowledge of or a concern of illegal or dishonest activity, the employee is to contact his/her immediate supervisor or the Human Resources Coordinator. If the Human Resources Coordinator is the subject of the employee's concern, then the employee should contact the CEO. The employee must exercise sound judgment to avoid baseless allegations. An employee who intentionally files a false report of wrongdoing will be subject to discipline up to and including termination.

All reports of illegal and dishonest activities will be promptly submitted to the Human Resources Coordinator who is responsible for investigating and coordinating corrective action, if any. If the Human Resources Coordinator is the subject of the investigation, then the CEO shall be responsible for investigating and coordinating corrective action, if any.

Whistleblower protections are provided in two important areas -- confidentiality and against retaliation. Insofar as possible, the confidentiality of the whistleblower will be maintained. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law and to provide accused individuals their legal rights of defense. The Company will not retaliate against a whistleblower. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, or poor work assignments and threats of physical harm. Any whistleblower who believes he/she is being retaliated against must contact the Human Resources Coordinator or CEO, if the Human Resources Coordinator is the subject of the complaint, immediately. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

Employees with any questions regarding this policy should contact the Human Resources Coordinator.