

**STRATEGIC TRADE
RESEARCH INSTITUTE**

WHISTLEBLOWER POLICY

Purpose/Objective

All employees, directors and officers of Strategic Trade Research Institute will be protected from any disadvantage caused by raising legitimate concerns and shall report suspected illegal activities within the organization.

Strategic Trade Research Institute encourages its employees, directors and officers to maintain high ethical standards. This whistleblower policy is meant to provide a confidential and effective means for reporting suspected violations of the law. It further serves to protect individuals who report suspected violations from retaliation in any form.

Definitions

A “whistleblower” is defined as anyone who makes a good-faith effort to disclose information about “improper activities” or about significant threats to public health and safety.

“Improper activities” are defined as action that violates state or federal law or regulation, including but not limited to corruption, bribery, theft or misuse of STRI funds and/or property, fraudulent claims, coercion, willful omission to perform duty, economic waste, gross misconduct, gross incompetence or gross inefficiency, or any condition that may significantly threaten the health or safety of employees or the public.

Improper activities as defined by this policy exclude personnel actions, for which other remedies exist, from investigation. These types of actions include, but are not limited to, employee grievances, complaints, appointments, promotions, transfers, assignments, reassignments, reinstatements, performance evaluations, reductions in pay, dismissals, suspensions, demotions, violations of state civil service laws, labor agreement violations, reprimands or other disciplinary actions.

Reporting Responsibility

STRI is fully committed to providing a workplace that is open to and fosters communication concerning all aspects of its organization and operations, including compliance with all laws and ordinances. It is the responsibility of all directors, officers and employees to report improper activities or improper acts in accordance with this Whistleblower Policy. Toward that end, STRI has adopted this policy to protect its employees from unlawful threats, discrimination, retaliation or discharge as a result of their lawful responsibility to report any conduct they reasonably believe to be an improper activity.

Acting in Good Faith

Anyone filing a complaint must be acting in good faith and have reasonable grounds for believing the information disclosed indicates that the individual in question has engaged in an improper activity. Any allegations that prove not to be substantiated and prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

Confidentiality

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.

Authority of the Board

All reported concerns will be forwarded to the Strategic Trade Research Institute Board in accordance with the procedures set forth herein. The Board shall be responsible for investigating and making appropriate recommendations to the Board of Directors with respect to all reported concerns.

No Retaliation

The Whistleblower Policy is intended to encourage and enable directors, officers and employees to raise concerns within STRI for investigation and appropriate action. With this goal in mind, no director, officer or employee who, in good faith, reports a concern shall be subject to retaliation or, in the case of an employee, adverse employment consequences. Moreover, a director, officer or employee who retaliates against someone who has reported a concern in good faith is subject to discipline up to and including dismissal from the director or officer position or termination of employment.

Procedures for Reporting Concerns

Employees

Employees should first discuss their concern with the Director. If, after speaking with the Director, the individual continues to have reasonable grounds to believe the concern is valid, the individual should promptly report the concern to the other Board Members. In addition, if the individual is uncomfortable speaking with the Director, or the Director is a subject of the concern, the individual should report his/her concern directly to the Board.

The Board has specific and exclusive responsibility to investigate all concerns.

Concerns may also be submitted anonymously. Such anonymous concerns should be in writing and sent directly to the Board.

Directors and Officers

Directors and officers should submit concerns in writing directly to the Board.

Handling of Reported Violations

The Board shall address all reported concerns and notify the sender and acknowledge receipt of the concern within three business days, if possible. It will not be possible to acknowledge receipt of anonymously submitted concerns.

All reports will be promptly investigated by the Board and appropriate corrective action will be recommended to the Board of Directors, if warranted by the investigation. In addition, action taken must include a conclusion and/or follow-up with the complainant for complete closure of the concern.