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Work Services Corporation Board of Directors Policy

Whistleblower

Introduction

Work Services Corporation (WSC) is committed to the highest possible standards of ethical, moral, and legal business conduct. This policy aims to provide an avenue for employees to raise concerns with the reassurance that they will be protected from reprisals for whistleblowing in good faith. Specifically, this policy prohibits WSC officials from interfering with the right of an employee to blow the whistle, prohibits company officials from retaliating against an employee for having made a protected disclosure or having refused an illegal order, and provides a procedure for filing and addressing complaints of retaliation for whistleblowing.

Scope

This policy applies to all employees, including temporary, part-time, or contract employees, board members, and volunteers. This policy is intended to cover serious concerns that could have a significant impact on WSC, such as actions that:

- May lead to incorrect financial reporting
- Are unlawful
- Are in violation of company or board policy, including the code of conduct
- Otherwise amount to serious improper conduct

Safeguards

Harassment or Victimization. Harassment or victimization of the complainant will not be tolerated.

Confidentiality. Every effort will be made to protect the complainant's identity.

Anonymous Allegations. This policy encourages employees, board members, and volunteers to put their names to allegations because follow-up questions and investigations may not be possible unless the source is identified. Concerns expressed anonymously will be investigated, 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.

Malicious Allegations. Malicious allegations may result in disciplinary action.

Procedure

The Whistleblowing Procedure is intended to be used for serious and sensitive matters. Complaints may be submitted to Supervisors, Division Chiefs, President, Board Members, or Board Audit Committee. It is recommended that the complaint be presented to the lowest organizational level where it can appropriately be addressed. Any company official who receives a whistleblowing complaint has the responsibility to report his/her immediate supervisor. (Note: Employment related concerns should continue to be reported through normal channels to your supervisor and /or human resources representative. All sexual harassment complaints are reported directly to the human resources department).

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 needs to demonstrate to the person contacted that there are sufficient grounds for concern.

How the Complaint Will Be Handled

The action taken will depend on the nature of the concern. The Audit Committee of the WSC Board will receive a report on each complaint and the follow-up 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 by agreed action without the need for an investigation.

Report to Complainant. The complainant will receive follow-up on their concern within two weeks to include the following:

- Acknowledgement that the concern was received
- Indicating how the matter was dealt with
- Providing an estimate of time that it will take for a final response
- Indicating whether initial inquiries have been made
- Indicating whether further investigations will follow, and if not, why not

Further Information. The amount of contact between the complainant and the investigating body will depend on the nature of the issue and the clarity of information provided. Further information may be sought from the complainant. Subject to legal constraints, the complainant will receive information about the outcome of any investigation.