



**HERITAGE
RETREATS**
SINCE 1999

POLICY

Date:	January 1, 2020
Policy No:	I (a)
Policy Name:	Whistleblower Protection Policy
Supersedes Policy No:	n/a

General

HERITAGE RETREATS Inc. (“HERITAGE RETREATS”) requires its directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of HERITAGE RETREATS, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

It is the responsibility of all directors, officers and employees to report violations or suspected violations of high business and personal ethical standards and/or applicable legal requirements (“Violations”) in accordance with this Whistleblower Policy.

No Retaliation

No director, officer or employee who in good faith reports a Violation shall suffer harassment, retaliation or adverse employment consequence. 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. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within HERITAGE RETREATS prior to seeking resolution outside the organization.

Reporting Violations

Questions, concerns, suggestions or complaints regarding the ethical and legal standards should be addressed to someone who can address them properly. In most cases, an employee’s supervisor is in the best position to address an area of concern. However, if the employee is not comfortable speaking with his/her supervisor or is not satisfied with his/her supervisor’s response, the employee is encouraged to speak with the President, CEO, COO, CFO, or anyone in management who the employee is comfortable approaching.

Supervisors and managers are required to report Violations to the Compliance Officer, who has specific and exclusive responsibility to investigate all reported Violations. For suspected fraud, or when the employee is not satisfied or is uncomfortable with following the organization’s open-door policy, the Compliance Officer should be contacted directly.



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The Compliance Officer will notify the sender and acknowledge receipt of the reported Violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

Compliance Officer

The Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning suspected Violations. The Compliance Officer shall advise the Chairman of the Board of Directors (“BOD”) and the President, at his/her discretion, that the complaint entails a significant risk to HERITAGE RETREATS. The Compliance Officer shall report to the BOD at least annually on compliance activity. In the event that a reported concern or complaint involves corporate accounting practices, internal controls or auditing, the Compliance Officer shall immediately notify the BOD of the complaint and work with the BOD until the matter is resolved. At the Compliance Officer’s discretion, he is duly authorized to consult with outside counsel, for a maximum of 2 billing hours, for guidance in dealing with the reported violation before presenting findings to the BOD.

Acting in Good Faith

Anyone filing a complaint concerning a Violation of the ethical and legal standards noted above must act in good faith and have reasonable grounds for believing the information disclosed may indicate a violation of such standards. 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.

Confidentiality

Violations may be submitted on a confidential basis by the complainant. Reports of Violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.