

OFFICE WHISTLE-BLOWING POLICY

A “Whistleblower” as defined by this policy is a Company employee 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.

Examples of illegal or dishonest activities are:

- Violations of Local or International laws.
- Violations of the Company safety policies.
- Billing for services not performed or for goods not delivered; and
- Other fraudulent actions.

2.16.1 Policy

If an Office Employee has knowledge of or concern of illegal or dishonest fraudulent activity, the Employee is to contact his/her Department Manager or the Human Resources Manager.

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.

Depending on the quality and the amount of assistance the whistleblower will provide, the Company may consider a “Whistleblower Reward”.

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 Manager immediately.

The right of a whistleblower for protection against retaliation, does not include immunity for any personal wrongdoing that is alleged and investigated.

All reports of illegal and dishonest activities will be promptly submitted to the Human Resources Manager who is responsible for investigating and coordinating corrective actions.

Employees with any questions regarding this Policy should contact the Human Resources Manager.

Signed by:



Chief Operating Officer
George A. Kouleris