

HUMAN RESOURCES POLICY AND PROCEDURE
GOOD DAYS

SUBJECT: Whistleblower Policy

EFFECTIVE DATE: 02/20/2017

1) Policy

Chronic Disease Fund, Inc. DBA Good Days and its entities and affiliates (collectively, "Good Days") requires directors, officers, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representative of Good Days, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

2) Purpose

The Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that Good Days can address and correct, inappropriate conduct and actions. It is the responsibility of all board members, officers, and employees to report concerns about violation of Good Days code of ethics or suspected violation of law or regulation that govern Good Days operations.

- a) A whistleblower as defined by this policy is an employee of Good Days 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.
- b) Examples of illegal or dishonest activities are violations of federal, state or local laws; billing for services not performed or for goods not delivered; and other fraudulent financial reporting.
- c) If an employee has knowledge of or a concern of illegal or dishonest fraudulent activity, the employee is to contact his/her immediate supervisor or the Human Resources Director. 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.
- d) Good Days has an open door policy and suggests that employees share their questions, concerns, suggestions or complaints with their supervisor. If you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with Executive Director, Chief Operating Officer, or Senior Director of Human Resources. Supervisors and managers are required to report complaints or concerns about suspected ethical and legal violations in writing to the Good Days Compliance Officer who has the responsibility to investigate all reported complaints. Employees with concerns or complaints may also submit their concerns in writing directly to their supervisor, the Executive Director, or the organization's Compliance Officer.
- e) Good Days Compliance Officer is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Compliance Officer will advise the Executive Director and/or the Board of Directors of all complaints and their resolution and will report at least annually to the Executive Director and/or the Board of Directors on compliance activity relating to accounting or alleged financial improprieties.
- f) The Good Days Compliance Officer shall immediately notify Executive Management of any concerns or complaint regarding corporate accounting practices, internal controls or auditing and work with them until the matter is resolved.
- a) 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

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

- b) Defend Trade Secrets Act (DTSA) Compliance: "Immunity from Liability for Confidential Disclosure of a Trade Secret to the Government or in a Court Filing:
 - (1) Immunity—An individual shall not be held criminally or civilly liable under any federal or state trade secret law for the disclosure of a trade secret that—(A) is made—(i) in confidence to a federal, state or local government official, either directly or indirectly, or to an attorney; and (ii) solely for the purpose of reporting or investigating a suspected violation of law; or (B) is made in a complaint or other document filed in a lawsuit or other proceeding, if such filing is made under seal.
 - (2) Use of Trade Secret Information in Anti-Retaliation Lawsuit—An individual who files a lawsuit for retaliation by an employer for reporting a suspected violation of law may disclose the trade secret to the attorney of the individual and use the trade secret information in the court proceeding, if the individual—(A) files any document containing the trade secret under seal; and (B) does not disclose the trade secret, except pursuant to court order.
- c) All reports of illegal and dishonest activities will be promptly submitted to the Senior Director of Human Resources who is responsible for investigating and coordinating corrective action.
- d) Employees with any questions regarding this policy should contact the Senior Director of Human Resources.

Good Days reserves the right to revise this policy at any time.

Signature page follows or signatures are on file with human resources.

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Accepted and agreed:

Accepted by:

Employee Signature

Date

Employer Signature

Date

Employee Printed Name

Employer Representative Printed Name