

## **Reporting Illegal or Unethical Behavior (“Whistleblower” Policy)**

HillSouth’s Code of Ethics requires employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of HillSouth, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations. Employees, vendors and clients should report promptly to supervisors, managers or other appropriate personnel as listed below when they observe illegal and or unethical behavior, and any violations of law, rules, or regulations, and when in doubt about the best course of action in a particular situation. Examples of unlawful or improper behavior include, but are not limited to, any of the following:

- fraud, theft, or embezzlement;
- improper destruction of records;
- improper use of property;
- improper use of assets;
- safety/health violations; discrimination and abusive practices;
- bribery or kickbacks;
- unauthorized use or disclosure of confidential information.

The supervisor, manager or other appropriate personnel to whom such matters are reported should not be involved in the reported illegal or unethical behavior or violation of law, rules, or regulations. Any supervisor or manager who receives a report of violation or potential violation must report it immediately to the persons listed below. It is the policy of the organization not to allow retaliation for reports of misconduct by others made in good faith by employees. Employees must cooperate in internal investigations of misconduct. Any person involved in an investigation of possible misconduct in any capacity must not discuss or disclose any information to anyone outside of the investigation unless required by law or when seeking his or her own legal advice. Any use of these reporting procedures in bad faith or in a false or frivolous manner is a serious violation of HillSouth’s commitment to ethical behavior in the workplace. We must all work to ensure prompt and consistent action against illegal or unethical behavior. These are some steps to keep in mind:

1. Seek help. In the rare case where it may not be appropriate to discuss an issue with a supervisor, or where you do not feel comfortable approaching the supervisor with your question, discuss it with the CEO, the CTO or legal counsel.
2. Your report of ethical violations may be made in confidence and without fear of retaliation. If your situation requires that your identity be kept secret, your anonymity will be protected. This organization does not permit retaliation against employees or clients for good faith reports of potential ethical violations or questionable accounting or auditing matters.
3. Always ask first, act later. If you are unsure of what to do in any situation, seek guidance before you act.

**Supervisors by Department:**

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**Anonymous Reporting:**

Dial 843-432-4007; leave anonymous voicemail