
WHISTLEBLOWER POLICY: U.S. and ABROAD

1. POLICY

EWMI's directors, officers, employees, consultants, contractors and agents ("EWMI associates") bear responsibility for maintaining the standards and rules of EWMI's Code of Conduct. EWMI associates shall report any good faith concerns about violations or suspected violations of EWMI's Code of Conduct, policies, applicable laws or regulations, or any illegal, unethical or other improper acts or practices, to EWMI's Director of Internal Audit for International Operations. In case of concerns about the conduct of the Internal Auditor, concerns should be addressed to EWMI's President. In the case of concerns about the conduct of the President, concerns should be addressed to the Board of Directors. Concerns should be reported promptly.

An associate may communicate concerns in person in a face-to-face meeting or may set them forth in writing and indicate if he or she wishes to discuss the matter with the Executive Vice President, Director of Internal Audit for International Operations or the Board of Directors. Such concerns could include acts or practices of employees, consultants or vendors that, for example, constitute fraud, might lead to incorrect financial reports, involve discrimination or harassment, or might violate contractual or other commitments to sponsors or partners.

The recipient of a report of a violation or suspected violation shall use his or her best efforts to treat the report, the investigation of the report and the identity of the person making the report as confidential, consistent with the recipient's responsibility to investigate the report and correct any confirmed violation, in compliance with law and regulations, as applicable. It is the policy of EWMI to comply

with reporting and other requirements imposed by law and regulation with respect any violation or suspected violation.

If the alleged wrongdoing is confirmed, the individuals responsible for the wrongdoing will be subject to appropriate disciplinary action, including termination for cause.

1.1 Intent of Policy

EWMI is committed to the highest possible standards of ethical and moral conduct in all its activities. EWMI complies fully with all applicable laws and regulations and adopts and observes internal policies that support ethical behavior and apply to all EWMI associates. EWMI's internal controls and operating procedures are intended to detect and to prevent or deter improper activities. However, EWMI recognizes that even the best control systems cannot provide absolute assurance of detection, prevention or deterrence.

When suspected legal or ethical violations occur, EWMI has the responsibility to investigate and correct the violations. This Whistleblower Policy is intended to encourage EWMI associates to report suspected improper activities and to provide guidance on the procedures for making reports under this policy.

1.2 Scope of Policy

The policy contained herein shall apply to all EWMI associates worldwide, including all employees whether full-time, part-time or temporary, all independent contractors, all officers and all Board members.

1.3 Confidentiality

If an EWMI associate wishes, concerns may be submitted on a confidential basis and will be investigated to the extent possible. EWMI will use its best efforts to protect a complainant's

identity. It should be noted that appropriate investigation may not be possible unless the source of the information is identified. Serious allegations will require thorough investigation that makes it impossible for EWMI to guarantee confidentiality in all cases.

1.4 Retaliation Prohibited

It is the policy of EWMI that no employee, officer, director, consultant, contractor or agent of EWMI who in good faith reports any action or suspected action taken by, within or otherwise involving EWMI that is illegal, fraudulent or in violation of public policy or any policy of EWMI (each a “violation”) shall suffer intimidation, harassment, discrimination or other retaliation or, in the case of employees, adverse employment consequence. Any form of retaliation, including harassment, discrimination or other victimization, against an associate submitting a concern in good faith will not be tolerated. In addition, no EWMI associate shall be adversely affected because he or she refuses to cooperate with, participate in, or conceal any violations of EWMI’s Code of Ethics or of applicable laws or regulations, or any illegal, unethical or other improper acts or practices. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing.

1.5 Malicious Allegations

Malicious, false or bad faith allegations will result in disciplinary action.

1.6 Notification

A copy of this policy shall be distributed to all directors, officers and employees.