Whistleblower Policy

1. Overview and Scope

ReliabilityFirst Corporation (RF) is committed to high standards of ethical, moral, and legal business conduct. In line with this commitment, this policy is designed to provide an anonymous and confidential means for employees to raise concerns along with the reassurance that they will be protected from reprisals or victimization for whistleblowing.

2. Applicability

This policy applies to all RF employees and staff[1] (Personnel), directors, officers, and agents, and any member and its representatives who serve on any RF Committee, organizational group, working group or task force.

3. Policy on Reporting

Any person who reasonably believes that there has been a material violation of the Code of Business Conduct and Ethics ("Code") can report it using the procedures hereinafter described. Any person who in good faith reports such violations of the Code, or testifies, participates in, or otherwise assists in any proceeding related to a reported violation under the Code, will be protected from threats of retaliation, discharge, or other types of discrimination.

Any person who wants to report a concern, potential violation, or evidence of a violation of the Code may do so via either of the two methods set forth in the procedure below.

A. Reporting to the President and CEO, Chair of Finance and Audit Committee, or Vice President and General Counsel

Any person may contact the President and CEO of RF, the Chair of the Finance and Audit Committee of the Board of Directors, or the Vice President and General Counsel of RF. Anonymous and confidential written, telephonic or electronic communications will be accepted by any of these individuals. The contact information for the President and CEO, the Chair of the Finance and Audit Committee, and Vice President and General Counsel is set forth below.

[1] Staff includes RF contractors, interns, and temporaries.

Contact Information

President and CEO
Timothy R. Gallagher
3 Summit Park Drive
Suite 600
Cleveland, OH 44131
Tel: 216-503-0600
Fax: 216-503-9208
tim.gallagher@rfirst.org

Chair, Finance and Audit Committee
Lead Independent
Joanna Burkey
Tel: 512-577-5285
joanna.c.burkey@gmail.com

Vice President and General Counsel
Niki Schaefer
3 Summit Park Drive
Suite 600
Cleveland, OH 44131
Tel: 216-503-0600
Fax: 216-503-9208
niki.schaefer@rfirst.org

B. Reporting via ReliabilityFirst's Third-Party Hotline

Any person may report a concern, potential violation, or evidence of a violation of the Code through the third-party vendor, by using the contact information provided below:

- Website: www.lighthouse-services.com/rfirst
- E-mail: reports@lighthouse-services.com (must include company name with report)
- Toll-Free Telephone:
  - English speaking USA and Canada: 844-490-0002
  - Spanish speaking USA and Canada: 800-216-1288
  - Spanish speaking Mexico: 01-800-681-5340
  - French speaking Canada: 855-725-0002
- Fax: (215) 689-3885 (must include company name with report)

Regardless of which reporting method is chosen, reporters are encouraged to provide as much specific information as possible including names, dates, places, the events that took place, the person's perception of why the incident(s) may be a violation, and what action the person recommends be taken.

The President and CEO of RF, the Chair of the Finance and Audit Committee of the Board of Directors, or the Vice President and General Counsel of RF will determine and direct an appropriate investigation for each submission. If a reported issue concerns the President and CEO, the Chair of the Finance and Audit Committee, or the Vice President and General Counsel, that individual will not receive the report and will not be involved in the investigation of the reported issue.

Reporters who choose to identify themselves will receive a reply to their report within 20 working days or as soon as practicable thereafter.

Related Policies/Procedures	Code of Conduct
Policy Owner	Legal Department
Policy Reviewers	Human Resources, Legal, CEO

Version	Reason for Change	Date	Approved by
1.0	Initial Version	7/26/2006	President & CEO
2.0	Minor edits	12/9/2008	President & CEO
3.0	Minor edits	3/7/2014	President & CEO
4.0	Pulled from Code of Conduct to be a standalone policy.	5/4/2020	Legal
5.0	Updated to match new policy format and to reflect the temporary FAC chair.	2/18/2025	Legal