

Whistleblower (Reporting Misconduct) Policy

All employees and volunteers shall conduct business in a manner consistent with the highest legal and ethical considerations.

Society employees and volunteers are required to promptly report any concerns relating to unethical conduct, violation or potential violation of applicable law, regulation or Society policy. Examples of behavior that should be reported include, but are not limited to:

- Theft
- Financial reporting that is intentionally misleading
- Improper or undocumented financial transactions
- Improper destruction of records
- Improper use of assets
- Violation or potential violation of any Society policy, including the Conflict of Interest Policy
- Violation or potential violation of any federal, state or local law or regulation

The Society has several mechanisms to facilitate such reporting. Employees can report concerns to the Executive Vice President of Human Resources, or their designee, or the Chief Legal Officer. An employee can also choose to report anonymously by contacting ComplianceLine at:

- Call 1-888-418-1477 (toll free, 24 hours a day, 7 days a week)
- Web reporting: www.mycompliancereport.com Company ID: NMSS

ComplianceLine is an independent firm engaged by the Society to provide an anonymous reporting service. A trained specialist from ComplianceLine handles all contacts. An employee is invited, but not required, to provide contact information which can be helpful in expediting an investigation. Should an employee decide to remain anonymous, he or she will be given a reference number in order to follow up on the report at a later date. The ComplianceLine specialist will put together a report, which will be forwarded to the designated Society employee or volunteer leader authorized to act on the information provided. If an employee wishes to remain anonymous, ComplianceLine will not report identifying information to the Society. The designated individual receiving the report shall investigate the matter as necessary and will respond to the reporting individual through ComplianceLine.

Everyone should feel safe to report behavior that is contrary to Society policy, our cultural values or the law. For this reason, retaliation, intimidation, harassment or adverse employment consequences against an employee or volunteer for a truthful and good faith report of misconduct will not be tolerated and will subject the responsible party to disciplinary action. This non-retaliation policy, however, is not intended to create amnesty for anyone directly involved in fraud or misconduct.

The Society will follow up on all reports, regardless of whether or not the report is anonymous. All reports and investigations are handled with discretion and, to the extent possible, in a confidential manner. Based on the allegations raised and the nature of the issues, the Society will determine whether an investigation is warranted, and if so, who the appropriate individual is to conduct the investigation. The Society will conduct prompt, consistent and appropriate

investigations, compliant with all applicable laws, regulations, and Society policies. Employees are expected to participate in and cooperate with internal investigations and to provide truthful and complete information.

Upon the submission of an allegation, the Society's designated recipient of the complaint shall notify the Chair of the Audit Committee. After an investigation is conducted, the Chair of the Audit Committee shall inform the Audit Committee and the Board of Directors of any complaint in which it is determined that material improper conduct occurred.