



Industrial Welding and Mechanical Incorporated
Whistleblower Protection Policy
July 1, 2023
Version 1.0
Responsible Party: Paul Duncan, CEO
Responsible Party Email: pduncan@iwmiva.com

WHISTLEBLOWER PROTECTION POLICY

Overview

At Industrial Welding and Mechanical Incorporated (IW&MI), we believe that our responsibility to protect whistleblowers is imperative to upholding our ethical standards and ensuring the integrity of our business. Through a safe and confidential reporting process outlined in this policy, IW&MI employees can bring forth and address concerns about illegal or unethical activity.

This policy applies to all IW&MI employees, temporary employees, and volunteers. This policy is upheld by the CEO of IW&MI.

Policy

For the purposes of this policy, a whistleblower is defined as any IW&MI employee who reports what is believed to be illegal or unethical behavior to the appropriate party as specified in this policy.

For the purposes of this policy, all illegal or unethical conduct falls under the scope of imminent or ongoing. Employees are encouraged to report not only ongoing illegal or unethical activity but also are encouraged to report imminent violations, especially such violations that could impact public health or safety.

Illegal and unethical behaviors include violations of local, state, or federal laws, fraudulent financial activities, discrimination, safety violations, as well as other inappropriate behaviors outlined in the IW&MI Code of Ethics, IW&MI Code of Conduct, and IW&MI Employee Handbook.

If an employee believes they have knowledge or concern of imminent or ongoing illegal or unethical activity, the employee is to contact the CEO of IW&MI in a timely manner. The employee is not responsible for investigating the alleged illegal or unethical activity nor is he/she responsible for determining fault or corrective measures.

An employee making a report of illegal or unethical activity is to use sound judgment, avoiding baseless accusations. If it is found that the employee has intentionally filed a false report of illegal or unethical activity, the employee will be subject to discipline up to termination.

Whistleblowers who report illegal or unethical activity in good faith will be protected from retaliation per Virginia Code § 40.1-27.3, the FLSA, and the UNCAC. Retaliation in this policy includes, but is not limited to demotion, termination, harassment, or any other adverse employment action. Retaliation against a whistleblower is prohibited and those involved will be subject to disciplinary action up to termination. Any employee who experiences retaliation for reporting a concern should immediately bring it to the President's attention.

Whistleblower identities will be kept confidential to the extent permitted by law. Appropriate efforts will be made to protect their anonymity.

IW&MI is committed to maintaining an environment where employees feel safe to raise concerns without fear of retaliation.

IW&MI follows all relevant laws and regulations regarding Whistleblower Protection at the local, state, and federal levels.

IW&MI's Whistleblower Protection Policy is a living document and will be reviewed annually to ensure its continued relevance and effectiveness. Additional reviews may occur if there is a change in relevant laws or regulations that require an amendment to this policy. Employees will be notified and required to acknowledge through signature any changes to this policy.

Next review on 12/01/2024

DocuSigned by:

A handwritten signature in black ink that reads "Paul Duncan". The signature is written in a cursive, flowing style. It is positioned to the right of a blue bracket-like graphic element.

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Paul Duncan, CEO

07/01/2023