



Whistleblowing Policy

Section I: Our Purpose

I.1 Our Goals & Commitment

The vision of Maryland Marketing Source, Inc. is to provide our clients with accurate, timely, and actionable research results. To achieve our vision, it is crucial that all of our employees and partners understand, follow, and adhere to our corporate values of honesty, integrity, and confidentiality. We have put guidelines and policies in place to ensure we live by these values in our day-to-day work.

Together with our values, we want to have feedback and encourage people to speak up when they see activity or behavior that they feel is wrong or does not match our values. The goal of this policy is to provide very clear guidelines on how we approach and manage this feedback. With our whistleblowing policy, we aim to ensure:

- Every employee should have the chance to speak up anonymously when they feel we are not adhering to our corporate values. They should have a place to report misconduct, every report will be heard and acted on, and we will make improvements based on the results.
- Maryland Marketing Source, Inc. believes everyone should be able to make reports anonymously. We commit to protecting informant's identities and they only need to reveal themselves if they choose to.
- We will investigate every report of misconduct. At the end of the investigation, we will document the results and provide feedback when appropriate.

I.2 Our Commitment

Maryland Marketing Source, Inc. wants our employees to know they can provide information on any concerns they have, understand where they can report their concerns, know what happens after they make a report, and ensure they feel safe in providing a report. Maryland Marketing Source, Inc. also wants to let them know about their right to be anonymous as well as how we, as an organization, will ensure they are not subject to any retaliation or other abuse because they made a report.

I.3 What Conduct Should Be Reported

It is important that Maryland Marketing Source, Inc. outlines what behavior we want to be reported under this policy. We want to hear from you if you witness or know about any behavior that is:

- Fraudulent;



- Illegal;
- Corrupt;
- Dishonest;
- Unethical;
- Violates the law or any legal code;
- Is creating an unsafe environment;
- Breaches any of our company's policies;
- Discrimination;
- Harassment and/or bullying of any kind;
- Any conduct which is detrimental to Maryland Marketing Source, Inc. and could cause financial or non-financial loss;

1.4 Who Falls Under This Policy

The following would be considered an “eligible person” and would fall under Maryland Marketing Source, Inc.’s whistleblowing policy.

- Employees (including directors, managers, interns, and secondees);
- Contractors, consultants, service providers, suppliers, business partners;
- Former employees;
- Clients.

This policy applies to all Maryland Marketing Source, Inc.’s businesses, divisions, and offices. It also applies across all jurisdictions where we operate. If local legislation, regulation, or laws provide a higher level of protection than what is included in this policy, the local legislation will take precedence.

Section 2: Process For Making A Report

2.1 What Options Do Employees Have For Making A Report

If an employee or eligible person would like to make a report, they have different channels available where they can do this. Detailed instructions for how to use and approach each of these channels is included in Appendix I.

- Whistleblowing/Anonymous Reporting via web and mobile {<https://mdmarketingsource.com/security-%26-compliance>};
- Anonymous email {info@mdmarketingsource.com};
- Via employee hotline {410-922-6600 x101};
- Via post {9419 Common Brook Road, Suite 216, Owings Mills, MD 21117};
- Via fax {410-922-6675}
- Speak with a senior leader at Maryland Marketing Source, Inc.;
- Speak with the owner of Maryland Marketing Source, Inc.’s whistleblowing program.



2.2 You Can Remain Anonymous

Maryland Marketing Source, Inc. respects and protects your identity if you choose to make an anonymous report. You can choose to remain anonymous while making a report, interacting with case managers during an investigation of your report, as well as after your case is closed. At any given time you can identify yourself, but this is your choice and at no point do you need to do this or will you be forced to provide your identity.

If you decide to disclose your identity, Maryland Marketing Source, Inc. will work to protect your identity and will outline and document who in the organization will know you submitted your report. Maryland Marketing Source, Inc. will also take all steps necessary (and outlined in this policy) to ensure you do not suffer any retaliation.

It is worth noting that Maryland Marketing Source, Inc. will make every endeavor possible to investigate your report, but in some cases, there are limitations of what can be achieved if the informant decides to remain anonymous.

2.3 What Is The Investigative Process?

It is important for Maryland Marketing Source, Inc. to be transparent with our employees and outline what is the process for us to investigate a report submitted through our whistleblowing channels. Below, we have provided the different steps a case manager or member of our whistleblowing team will go through once a report is received until the case is closed.

- Report (anonymous or otherwise) is received.
- A case manager is assigned to the report to assess it and confirm its receipt.
- The case manager will do an initial assessment to confirm it is a valid report and request permission to investigate.
- The case manager will begin their investigation. This can include corresponding with the informant if there is a channel to do this.
- The case manager will investigate and update management and the informant per policy guidelines.
- Once the case manager has finalized their investigation and report, management and the informant will be updated.
- At this point, the case manager will hand everything over to management for any subsequent action to take place.



2.4 Who Is Alerted To A Report

Once a report is submitted (anonymous or not), this report goes to the Data Protection Officer. This person will then assess the report and will manage the investigation.

Certain senior managers might be alerted to the report as part of the reporting process or if they are involved in the investigation in some manner.

Any information that could potentially identify an anonymous informant will be held in the strictest confidence and will not be shared, unless Maryland Marketing Source, Inc. is compelled by law.

2.5 What Is The Process Of Updating The Informant

As part of our investigative process, Maryland Marketing Source, Inc. will update the informant of the progress of the investigation. These updates can include the following:

- Maryland Marketing Source, Inc. has confirmed the receipt of a report from the informant.
- Maryland Marketing Source, Inc. has begun the investigative process.
- The investigation is currently ongoing.
- The investigation has been closed.

Maryland Marketing Source, Inc.'s commitment is that the informant will be updated once a month while the investigation is ongoing. They will then be updated once the investigation has been closed.

Maryland Marketing Source, Inc. will strive to provide as much feedback on the investigation as possible. However, due to Maryland Marketing Source, Inc.'s privacy guidelines, there often is information that cannot be shared with the informant.

2.6 What If The Informant Is Not Satisfied With The Result

If, after receiving the summarized report of the investigation, the informant is not satisfied with the result, they can escalate this to the Chief Security Officer. The informant can provide this escalation in writing so that a formal review can take place. While the Chief Security Officer commits to review the request, Maryland Marketing Source, Inc. is under no obligation to reopen the investigation. If the Chief Security Officer concludes that the investigation was conducted properly and no new information exists that would change the results of the investigation, the investigation will be concluded.



Section 3: How Informants Are Protected

3.1 Anonymity After Submitting A Report

Section 2.2 discussed how an eligible person can remain anonymous during the process of submitting a report. After submitting a report, the following policies around anonymity are in place to protect an informant's identity.

- The informant has the right to remain anonymous and does not need to identify themselves at any time during the investigation process.
- Maryland Marketing Source, Inc. uses tools and platforms that help protect an informant's identity during and after submitting a report.
- At no time will Maryland Marketing Source, Inc. force the informant to reveal their identity.
- The informant can refuse to answer questions they feel could identify themselves. If the informant reveals themselves at any time, you will document who will have access to their identity. This can include the case manager, whistleblowing program owner, etc.

3.2 Potential Retaliation

An informant might be concerned that staff, management, or the organization might retaliate against them. In this case, Maryland Marketing Source, Inc. will protect the informant from:

- Being terminated or having their employment ceased;
- Performance management;
- Harassment on the job or workplace bullying;
- Warnings or disciplinary actions;
- Discrimination;
- Any other action that can be perceived as retaliation for making a report.

3.3 Considered Risk of Retaliation

In the case of "considered risk of retaliation", the informant believes retaliation is near or imminent, and they are targeted for retaliation. In cases of considered retaliation, the informant should contact the Chief Security Officer. The Chief Security Officer will take the action they feel is appropriate as well as come up with recommendations for how the situation can be resolved. Potential steps to protect the informant from a considered risk of retaliation can include:

- The informant taking leave.
- The informant being reassigned to other duties.



3.4 Already Retaliated Against

If the informant feels that they have already been retaliated against, they should escalate this immediately to the Chief Security Officer. The Chief Security Officer will take the action they feel is appropriate as well as come up with recommendations for how the situation can be resolved. Potential steps to protect the informant after retaliation has occurred can include:

- The informant taking leave.
- The informant being reassigned to other duties.

3.5 Retaliation Not Adequately Resolved

If the informant feels their report of retaliation was not resolved adequately can escalate this case in writing. The report will need to go to Chief Security Officer and they will investigate the matter and process for how the retaliation was dealt with.

3.6 How Maryland Marketing Source, Inc. Deals With Retaliation

Maryland Marketing Source, Inc. does not tolerate any attempts to retaliate against an informant who has made a report. Any employee or associated person that found retaliating will face disciplinary action, including the potential to be terminated from their roles.

3.7 Separation Of Issues

Maryland Marketing Source, Inc. will be able to still raise any issues related to work or performance related issues. While Maryland Marketing Source, Inc. will protect the informant from any retaliation, it is also important that they are still effective in their job. Maryland Marketing Source, Inc. can still raise any performance or contract issues with the informant as long as they are kept separate and not influenced at all from any reports that have been made.

3.8 Protection & Immunity For Others

Other parties that might have to bear witness or are involved in the investigation will be protected from retaliation in the same manner as the informant.

3. 9 Legislative/Regulation Protection & Assistance

If in any jurisdictions or locales where Maryland Marketing Source, Inc. operates has whistleblowing protection laws that provide a higher level of protection than what is included in this policy, the local legislation will take precedence.



Section 4: Our Roles & Responsibilities

4.1 Roles

The roles within Maryland Marketing Source, Inc.'s whistleblowing program include the following:

- Program owner and whistleblowing protection officer (WPO);
- Day-to-day manager of Maryland Marketing Source, Inc.'s whistleblowing program;
- Case managers that investigate individual reports;
- Supervisors who are involved in cases and made aware of specific investigations.

4.2 Responsibilities

The following are the responsibilities of each role in Maryland Marketing Source, Inc.'s whistleblowing program.

Program owner/whistleblowing protection officer: This individual owns the entire program and is measured on its overall success. This includes employees knowing and understanding the program, an easy process of making a report, investigating reports, as well as being a point of escalation for any concerns or retaliation that has taken place. While this individual reports into the organization, the results of their work go directly to the Board of Directors.

Day-to-day manager: The day-to-day manager views incoming anonymous reports, assigns these reports to case managers, and manages them as they conduct investigations. This person is the first line of escalation and works collaboratively with case managers to ensure anonymous reports are heard and acted upon.

Section 5: Governance

5.1 Changes to Maryland Marketing Source, Inc.'s Policy

From time to time, Maryland Marketing Source, Inc.'s whistleblowing policy will need to change to keep up with our values, best practices, improvements, as well as legislation and regulations. Any changes to our whistleblowing policy will be communicated with all employees and any relevant stakeholders. This policy and any changes made do not form any contract of employment.



Any changes to Maryland Marketing Source, Inc.'s whistleblowing policy must be approved by the:

- President
- CEO
- Owner of Maryland Marketing Source, Inc.'s whistleblowing program

All changes will be reviewed by the Board of Directors and the Board can comment and provide feedback as necessary. All changes will also be documented in Maryland Marketing Source, Inc.'s whistleblowing policy and will be made available to all employees.

Appendix 1: Channels For Reporting

{Document in detail how an employee can submit a report to you, listing all channels and steps (or links to steps) to make a report}.

Appendix 2: Change Log

Date of Change	Responsible	Summary of Change
October 2021	President	Creation

Appendix 3: All Relevant Local Legislation/Regulation

Relevant, Maryland Whistleblowing laws can be found here:

<https://statelaws.findlaw.com/maryland-law/maryland-whistleblower-laws.html>