

## **Bedford Industries Whistleblower Policy**

Bedford Industries requires all of its employees to maintain high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of Bedford Industries, we must practice honesty and integrity in fulfilling responsibilities and comply with all applicable laws and regulations.

### **Reporting Responsibility**

The Bedford Industries Whistleblower Policy is intended to encourage and enable employees and other interested parties to raise serious concerns so that Bedford Industries can address and correct inappropriate conduct and actions. It is the responsibility of all employees and other interested parties to report concerns about violations of Bedford Industries' code of ethics or suspected violations of law or regulations that govern Bedford Industries' operations.

### **No Retaliation**

Bedford Industries will not retaliate against any employee or interested party who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of Bedford Industries. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

### **Reporting Procedure**

Bedford Industries has an Open Door Policy and suggests that employees share their questions, concerns, suggestions, or complaints with their supervisor. To foster an environment where employees and Management feel comfortable communicating with and voicing concerns to one another, Bedford uses an Open Door Policy. This policy means that all of Management's doors are open to all of the employees, and employees are free to talk with Management at any time. Supervisors and managers are required to report complaints or concerns about suspected ethical and legal violations in writing to Bedford Industries' Human Resources Manager, who has the responsibility to investigate all reported complaints. Employees with concerns or complaints may also submit their concerns in writing directly to their supervisor or Human Resources Manager. The Bedford Industries' Human Resources Manager is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved.

### **Accounting and Auditing Matters**

The Bedford Industries' Human Resources Manager shall immediately notify the Vice President, Finance of any concerns or complaint regarding corporate accounting practices, internal controls or auditing, and work with the Vice President, Finance until the matter is resolved.

### **Acting in Good Faith**

Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

**Confidentiality**

Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

**Handling of Reported Violations**

The Bedford Industries Human Resources Manager will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

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