WHISTLEBLOWER POLICY

This whistleblower policy is intended to be used for serious and sensitive issues. Serious concerns relating to financial reporting, unethical or illegal conduct, or other conduct not in line with Company policies and business practices should be reported to the Vice President of Regulatory Affairs. If employees do not feel comfortable reporting suspected violations to the Vice President of Regulatory Affairs, they may also report concerns under this policy in one of the following ways:

- Website: www.lighthouse-services.com/ospreymed
- English speaking USA and Canada: 833-460-0007
- Spanish speaking North America: **800-216-1288** (not available from Mexico)
- E-mail: <u>reports@lighthouse-services.com</u> (must include company name with report)
- Fax alternative for written documents: (215) 689-3885 (must include company name with report)

The Company encourages employees to make reports to the Company of any suspected illegal activity that occurs at the Company. While employees are permitted to make anonymous reports, employees should be aware that it may be more difficult for the Company to investigate and appropriately respond to anonymous reports. Reports of violations or suspected violations will be kept confidential to an extent possible that is consistent with the need to conduct an adequate investigation.

Anyone making a report under this policy must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation or a potential violation. Reporters of good faith reports are protected from reprisal and/or victimization. Any allegations that prove not to be substantiated and which prove to have been made for the sole purpose of false malicious reporting or knowingly to be false; will be viewed as a serious disciplinary offense.

The Company encourages any individual who believes they are being subject to retaliation for making a report under this policy to report any and all incidents of perceived retaliation to the Vice President of Regulatory Affairs. The Company will investigate retaliation complaints as appropriate and take other appropriate responsive action. Every effort will be made to ensure confidentiality in accordance with applicable laws. Any person who is found to have committed retaliation will be subject to appropriate corrective action, which may include discipline up to and including termination.

Personal employment-related concerns or questions should continue to be reported through the normal channels such as your supervisor and/or Human Resources. Please see the Employee Handbook for further information on how to report employment-related concerns.