

# **Whistleblower Protection and Reporting Mechanism Policy**

## **1. Purpose and Scope**

1 Nexus Intelligent Systems, Inc. ("the Company") is committed to maintaining the highest standards of ethical conduct, transparency, and accountability in all business operations. This Whistleblower Protection and Reporting Mechanism Policy ("Policy") establishes a comprehensive framework for reporting potential misconduct, protecting individuals who report such concerns, and ensuring a robust investigative process.

2 This Policy applies to all employees, contractors, consultants, board members, and other stakeholders associated with Nexus Intelligent Systems, Inc., regardless of position or tenure.

## **2. Definitions**

1 "Whistleblower" shall mean any individual who reports a potential violation of company policies, legal standards, or unethical conduct through the designated reporting channels.

2 "Protected Disclosure" refers to a good faith report of:

- a) Potential legal violations
- b) Financial misconduct or fraud
- c) Safety risks
- d) Unethical business practices
- e) Violations of company policies or code of conduct
- f) Potential environmental or regulatory non-compliance

3 "Confidential Information" means any details related to a whistleblower report that could potentially identify the reporting individual.

## **3. Reporting Mechanisms**

1 The Company shall provide multiple confidential reporting channels:

- a) Dedicated Ethics Hotline: +1 (888) 555-ETHICS
- b) Confidential Web Portal: [ethics.nexusintelligent.com](https://ethics.nexusintelligent.com)
- c) Encrypted Email: [ethics@nexusintelligent.com](mailto:ethics@nexusintelligent.com)
- d) Secure Postal Mail: Confidential Ethics Review, Nexus Intelligent Systems, Inc., 1200

Technology Park Drive, Austin, TX 78758

2 Reports may be submitted anonymously or with identification. The Company guarantees the highest level of confidentiality for all submissions.

#### **4. Whistleblower Protections**

##### **1 Non-Retaliation Guarantee**

- a) The Company strictly prohibits any form of retaliation against whistleblowers
- b) Retaliatory actions include, but are not limited to:
  - Termination of employment
  - Demotion
  - Harassment
  - Discrimination
  - Reduction in compensation or benefits

##### **2 Legal Protection**

- a) Whistleblowers reporting in good faith are protected under federal and state whistleblower protection laws
- b) The Company will not tolerate any direct or indirect attempts to identify or penalize reporting individuals

#### **5. Investigation Process**

##### **1 Initial Assessment**

- a) All reports will be promptly reviewed by the Ethics Review Committee
- b) Initial assessment will occur within 5 business days of report submission
- c) Determination of investigation scope and urgency

##### **2 Investigation Procedures**

- a) Comprehensive and impartial investigation
- b) Interviews with relevant parties
- c) Document and evidence collection
- d) Maintenance of strict confidentiality
- e) Documented findings and recommended actions

### 3 Timeframes

- a) Preliminary investigation: 15 business days
- b) Comprehensive investigation: 30-45 business days
- c) Complex investigations may require extended timelines

## **6. Reporting and Transparency**

1 The Ethics Review Committee will maintain confidential records of:

- a) Number of reports received
- b) Types of reported issues
- c) Investigation outcomes
- d) Corrective actions implemented

2 Annual aggregate reports will be provided to the Board of Directors, excluding individual identifiable information.

## **7. Training and Communication**

1 Annual mandatory training for all employees on:

- a) Ethical conduct
- b) Reporting mechanisms
- c) Whistleblower protections

2 Periodic communication of policy updates and reinforcement of ethical standards

## **8. Legal Disclaimer**

1 This policy is subject to modification at the Company's discretion.

2 Nothing in this policy creates a contractual obligation beyond existing employment agreements.

## **9. Execution**

Approved and Implemented: January 22, 2024

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Dr. Elena Rodriguez

Chief Executive Officer

Nexus Intelligent Systems, Inc.