

Whistleblower Policy

TITLE: Whistleblower Policy
DOCUMENT NO: DDH-2071
REVISION: A
AUTHOR: Greg Skodacek

Signature Authority

Title	Name	Signature	Date
CEO	David Du		
President	Danny Du		
Vice President / General Manager	Bill Marsh		
Director of Quality & Regulatory Affairs	Greg Skodacek		
Director of Operations	Tony Du		
Manager, Manufacturing	Dave Smith		
Purchasing Manager	Alvin Butler		
Quality Manager	Cheem Ang		
Chief Engineer	Mike Schold		

- 1.0 Purpose and Scope
 - 1.1 The aim of this policy is to ensure that employees, suppliers, suppliers' employees and contractors are fully aware that they should report concerns or suspicions about any activity that she/he considers to be illegal, unethical, dishonest, or fraudulent, on the part of any employee of DDH, and be assured that any information received will be treated seriously and, where possible, confidentially.
 - 1.2 DDH conducts its business with high standards of integrity and honesty and expects the same standards from all employees, suppliers and contractors.
- 2.0 Associated Documents
 - 2.1 DDH-2069 Code of Conduct
 - 2.2 DDH-2070 Anti-Bribery and Anti-Corruption Policy
- 3.0 Definitions:
 - 3.1 A whistleblower, as defined by this policy, is an employee, supplier, or contractor of DDH who reports an activity she/he considers to be illegal, unethical, dishonest, or fraudulent to one or more of the parties specified in this Policy. The whistleblower is not responsible for investigating the activity or for determining fault or corrective measures; appropriate management officials are charged with these responsibilities.
 - 3.2 Examples of illegal, unethical, dishonest, or fraudulent activities are:
 - 3.2.1 A criminal offense
 - 3.2.2 A failure to comply with a legal obligation
 - 3.2.3 Violations of federal, state or local laws
 - 3.2.4 A danger to the health and safety of an individual
 - 3.2.5 Dishonesty

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- 3.2.6 Corruption
- 3.2.7 Bribery
- 3.2.8 Inappropriate relationships with suppliers
- 3.2.9 Inappropriate handling of hazardous materials and waste
- 3.2.10 False accounting or reporting irregularities
- 3.2.11 A deliberate concealment of any of the above matters

4.0 Policy

- 4.1 If an employee has knowledge of or a concern of illegal, unethical, dishonest, or fraudulent activity, the employee is to contact his/her immediate supervisor, the Human Resources Manager, or the Director of Quality & Regulatory Affairs. The employee must exercise sound judgment to avoid baseless allegations. An employee who intentionally files a false report of wrongdoing will be subject to discipline up to and including termination.
- 4.2 A supplier or contractor who has knowledge of or a concern of illegal, unethical, dishonest, or fraudulent activity by a DDH employee is to contact the DDH Human Resources Manager or Director of Quality & Regulatory Affairs. Any concerns, complaints or grievances that relate to your company's internal organization, operations and practices should be dealt with formally through your company's normal reporting channels, policies or procedures. Such issues are not covered under DDH's Whistleblowing Policy.
- 4.3 Employees, suppliers, suppliers' employees and contractors may contact the Human Resources Manager or Director of Quality & Regulatory Affairs via telephone, email, or an anonymous letter.
- 4.4 Whistleblower protections are provided in two important areas -- confidentiality and against retaliation.
 - 4.4.1 Insofar as possible, the confidentiality of the whistleblower will be maintained. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law, and to provide accused individuals their legal rights of defense.
 - 4.4.2 The Company will not retaliate against a whistleblower. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, or poor work assignments and threats of physical harm.
- 4.5 Any whistleblower who believes she/he is being retaliated against must contact the Human Resources Manager or Director of Quality & Regulatory Affairs immediately. An employee who retaliates against a whistleblower will be subject to discipline up to and including termination. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.
- 4.6 All reports of an activity that are considered to be illegal, unethical, dishonest, or fraudulent will be promptly submitted to the Vice President, who is responsible for investigating and coordinating corrective action.
- 4.7 Employees, suppliers, or contractors with any questions regarding this policy should contact the DDH Human Resources Manager.

5.0 Contact Information:

- 5.1 Telephone – (760) 599-0171
- 5.2 Email – jenny@ddhent.com or greg@dutek.com
- 5.3 Address – 2220 Oak Ridge Way, Vista, CA 92081

Revision History

REV.:	ITEM#:	SUMMARY OF CHANGES:	Date
A	All	New Release	11/28/17