

WHISTLEBLOWER POLICY

Each employee has a responsibility to follow LLS core values of Integrity, Commitment and Respect, and to report any acts within the organization that would be detrimental to such values.

A whistleblower, as defined by this policy, is an employee of LLS who reports an activity that he/she considers to be illegal or dishonest. This includes activities such as billing for services not performed, fraudulent financial reporting, etc. The whistleblower is not responsible for investigating the activity or for determining fault or corrective measures; appropriate management officials are charged with these responsibilities.

Surfacing questionable activity to management is the most effective way for you to report unethical behavior. However, LLS realizes this is not always possible. Therefore, LLS has arranged, with a company called The Network (Hotline), to provide a special 800 number for employees who want to report questionable activity, but prefer to remain anonymous.

If you have knowledge of, or a concern of illegal, dishonest or fraudulent activity, you are asked to contact The Network (Hotline) at 1-800-736-0493. This service is available 24 hours a day, 7 days a week and allows you to speak up without fear or retaliation.

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.

LLS 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 threats of physical harm. Any whistleblower, who believes they are being retaliated against, must contact the Senior Vice President, Human Resources, immediately.

Employees are expected to 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. Employees with any questions regarding this policy should contact the Director of Human Resources.