



FamilyWise Fraud Reporting and Whistle Blower Policy

I. Purpose

In compliance with Section 806 of the Sarbanes-Oxley Act of 2002 (hereinafter the “Act”), FamilyWise Services. (“FamilyWise”) will provide protection for employees, directors and officers who complain of and/or provide evidence of fraud. Neither FamilyWise, nor any officer, employee, contractor, subcontractor, or agent of Familywise, may discharge, demote, suspend, threaten, harass, or in any other manner discriminate or retaliate against an employee in the terms and conditions of employment because of any lawful act done by the employee to provide information, cause information to be provided, or otherwise assist in an investigation regarding any conduct which the employee reasonably believes constitutes a violation of the federal criminal statutes prohibiting mail, wire, bank or securities fraud (18 U.S.C §§ 1341, 1343, 1344, or 1348), any rule or regulation of the Securities and Exchange Commission, or any provision of Federal law relating to fraud against shareholders. In addition, pursuant to Section 301 of the Act, the Audit Committee has established procedures for the receipt, retention, and treatment of complaints regarding accounting, internal accounting controls, or auditing matters; and the confidential, anonymous submission by employees of FamilyWise of concerns regarding questionable accounting or auditing matters.

II. Non-exclusive list of Fraud types

This document outlines the procedures available to FamilyWise employees for reporting complaints. Some common examples of theft, fraud and abuse that should be reported include:

1. Any improper accounting practice, internal controls issue, auditing matter or inaccurate reporting of financial results;
2. Theft of cash, merchandise or equipment;
3. Kickbacks or conflicts of interest;
4. Fraudulent expense reports, refunds or insurance claims;
5. Embezzlement;
6. Improper destruction of company documents;
7. Undercharging or overcharging customers;
8. Violation of anti-trust, environmental or other governmental compliance regulations; and
9. Intentional release of proprietary information. This list is indicative of the kind of issues covered by this Policy but is not exhaustive.

The following procedures are designed to encourage employees to come forward with concerns (and allow anonymous complaints), assure employees of protections against retaliation, and provide for prompt investigation and correction of any concerns raised.

III. Reporting Procedures

Employees wishing to make a complaint regarding accounting, internal controls, or auditing matters should contact the employee's supervisor, manager, or Fraud Control Officer. Anonymous reports are only as effective as the information obtained. Sufficient documentation supporting the complaint should always accompany the complaint or at least identify the documentation that should exist. Familywise's Fraud Control Officer is the Executive Director. In the case that the complaint is against the Executive Director, the employee should contact the Board Director, the Board Treasurer, or the Board Vice President. A complaint form will be made available to every employee. The form may also be obtained on-line and hard copies of the form will be available for pick-up in the Genesis2 lobby/entrance. Complaints may be made to the Executive Director (Compliance Officer) in person, by phone, or via email.

The officer receiving the report should ensure:

- The report is in writing or should prepare a written summary of the meeting if the report is received verbally;
- Maintain confidentiality; and
- Refer the report to the Governance Committee

External anonymous reports can only be followed up if accompanied by sufficient documentation supporting the report. In the case where an external anonymous report is received without supporting documentation, it will be at the discretion of the Governance Committee if further investigation is required.

Anonymous reports often prove to be correct but are to be treated with skepticism until thoroughly investigated in good faith.

Anonymous reports in many cases will justify a preliminary examination and investigation of the available evidence, but a more complete investigation should only proceed if the information received from anonymous sources is appropriately supported by evidence.

All reports made to the Governance Committee are to be investigated as per section VII *Procedures for Fraud Investigation*.

IV. Good Faith Requirement

Anyone filing a complaint concerning a violation or suspected violation of the law or regulation requirements 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.



V. Reporting Requirements

The Fraud Control Officer or the person to whom fraud is reported will:

- Record and collate fraud and corruption incident reports and associated documentation; and
- Maintains a Documentation of reports and follow up action

VI. Whistleblower Protections

FamilyWise supports and assures employees that they will not be victimized or disadvantaged by making a report.

Pursuant to the Act, employee conduct that is protected from retaliation includes providing information to or otherwise assisting in an investigation by a federal regulatory or law enforcement agency, any member of Congress or committee of Congress, or any person with supervisory authority over the employee or who has the authority to investigate, discover, or terminate misconduct, where such information or investigation relates to any conduct of FamilyWise that the employee reasonably believes constitutes a violation of specified federal fraud laws, any SEC rule or regulation, or any other federal law relating to fraud against shareholders.

Other protected conduct includes the filing, testifying, participating in, or otherwise assisting in a proceeding relating to alleged violations of any of the federal fraud or securities laws. Individuals may make good faith complaints and participate in an investigation without fear of retaliation. FamilyWise will not tolerate any form of retaliation against an individual who makes a complaint and/or participates in an investigation under this policy. Employees who believe that they have been subjected to retaliation should immediately notify the Compliance Officer or the Audit Committee Chairperson. FamilyWise will investigate all such complaints and take appropriate corrective action.

VII. Procedures and Fraud Investigation

All reports of fraudulent and corrupt activities will be thoroughly investigated in good faith. The Governance Committee determines whether the investigation is conducted by either an internal or external means or whether the matter is referred directly to a law enforcement agency.

VIII. Internal Investigations

An internal investigation is conducted by the Governance Committee, with or without personal or managers independent of the business unit in which the alleged fraudulent or corrupt conduct occurred

IX. Documentation of the Investigative Findings

Adequate records are to be made and kept in accordance with legal, best practice or privacy management guidelines.



X. External Investigations

An external party may be engaged to assist with the conduct of the investigation. All persons engaged should be appropriately qualified to deliver the work contemplated by reason for formal qualifications and relevant experience.

Requirements of external parties included:

- Entering into a binding agreement in relation to the release of confidential information coming to his or her possession during the course of the investigation
- Investigations are to be conducted in an atmosphere of transparency at all times.
- Investigations should comply with all relevant legislation in the jurisdiction in which action will or could be initiated

Where a matter is referred directly to a law enforcement agency, the Governance Committee will nominate a staff member who will act as the primary contact with that agency and coordinate all activities and information exchanges with the agency.

