



*Why PALS? because help isn't always just around the corner*



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## **WHISTLEBLOWER PROTECTION POLICY**

Patient Airlift Services, or “PALS”, requires directors, officers and employees, including part-time, temporary, volunteer, and contract employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the PALS, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

### **Reporting Responsibility**

PALS is committed to the highest possible standards of ethical, moral, and legal business conduct. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that PALS can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees and volunteers to report concerns about violations of PALS code of ethics or suspected violations of law or regulations that govern PALS operations. In conjunction with this commitment and PALS commitment to open communication, this policy aims to provide an avenue for employees to raise concerns and reassurance that they will be protected from reprisals or victimization for whistleblowing in good faith. However, if an employee feels that their anonymity is not required then they should follow our existing procedure. The whistleblowing policy is intended to cover serious concerns that could have a large impact on PALS, such as actions that:

- May lead to incorrect financial reporting;
- Are unlawful;
- Are not in line with company policy, including the Code of Business Conduct; or
- Otherwise amount to serious improper conduct.

Regular business matters that do not require anonymity should be directed to the employee’s supervisor and are not addressed by this policy.

### **No Retaliation**

It is contrary to the values of PALS for anyone to retaliate against any board member, officer, employee or volunteer who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of PALS. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

### **Reporting Procedure**

PALS has an open-door policy and suggests that employees share their questions, concerns, suggestions or complaints with their supervisor. If you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor’s response, you are encouraged to speak with HR or PALS President.

The whistleblowing procedure is intended to be used for serious and sensitive issues. Serious concerns relating to financial reporting, unethical or illegal conduct, should be reported in either of the following ways:

- Website: [www.lighthouse-services.com/palservices](http://www.lighthouse-services.com/palservices)
- English speaking USA and Canada: (833) 490-0007 (not available from Mexico)
- Spanish speaking USA & Canada: (800) 216-1288
- Spanish speaking Mexico: 01 (800) 681-5340
- French speaking Canada: (855) 725-0002
- E-mail: [reports@lighthouse-services.com](mailto:reports@lighthouse-services.com) (must include company name with report)
- Fax alternative for written documents: 215-689-3885 (must include company name with report)

Again, employment-related concerns should continue to be reported through your normal channels such as your supervisor, HR representative, or to the President.



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### **Timing**

The earlier a concern is expressed, the easier it is for us to take action.

### **Evidence**

Although you are not expected to prove the truth of an allegation, the employee submitting a report needs to demonstrate in their hotline report that there are sufficient grounds for concern.

### **Handling of Reported Violations**

The action taken will depend on the nature of the concern. The PALS Board of Directors receives a copy of each report and follow-up reports on actions taken by the company.

### **Initial Inquiries**

Initial inquiries will be made to determine whether an investigation is appropriate, and the form that it should take. Some concerns may be resolved by agreed upon action without the need for an investigation.

### **Feedback to Reporter**

Whether reported directly to PALS personnel or through the hotline, the individual submitting a report will be given the opportunity to receive follow-up on their concern:

- \* Acknowledging that the concern was received;
- \* Indicating how the matter will be dealt with;
- \* Giving an estimate of the time that it will take for a final response;
- \* Telling them whether initial inquiries have been made;
- \* Telling them whether further investigations will follow, and if not, why not.

### **Further Information**

The amount of contact between the individual submitting a report and the body investigating the concern will depend on the nature of the issue, the clarity of information provided, and whether the employee remains accessible for follow-up. Further information may be sought from the reporter.

### **Outcome of an Investigation**

At the discretion of the company and subject to legal and other constraints the reporter may be entitled to receive information about the outcome of an investigation.

### **Confidentiality**

Reporters to the hotline will have the ability to remain anonymous if they choose. Every effort will be made to protect the reporter's identity by our hotline vendor. Please note that the information provided in a hotline report may be the basis of an internal and/or external investigation by our company into the issue being reported. It is possible that as a result of the information provided in a report the reporter's identity may become known to us during the course of our investigation. Reports are submitted by Lighthouse to PALS or its designee, and may or may not be investigated at the sole discretion of our company.

### **Acting in Good Faith**

Anyone filing a written complaint concerning a violation or suspected violation 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.

*PALS reserves the right to modify or amend this policy at any time as it may deem necessary.*