



Whistleblower Policy

June 13, 2018

ConnXus is committed to operating in compliance with all applicable laws, rules and regulations and prohibits unlawful retaliatory practices against its employees by any of its officers, board members, employees, vendors, customers, or agents. This policy is intended to encourage employees to report any actual or suspected violations of federal, state, or local laws, or any facts or information relative to actual or suspected health and safety violations, security breaches, theft, mismanagement of funds, waste, fraud, kickbacks, harassment, discrimination, abuse of authority, or other illegal activities. ConnXus takes such complaints seriously and commits to taking prompt, remedial action where required. The Company has established a Compliance Committee who will be responsible for enforcement of Whistleblower Policy.

If an employee has knowledge of or desires to report a concern of suspected illegal or fraudulent activities, the employee should promptly report such activity to either of the following: (1) his/her immediate supervisor; (2) the next level of management above his/her supervisor, including the Chief Operating Officer and/or President; (3) the Board of Directors (4) by email at feedback@connxus.com; (5) or by mail to ConnXus, Inc, 9378 Mason Montgomery Rd, Box #303, Mason, Ohio 45040. An employee has the option to report the event anonymously. Upon receipt of the report, management and/or Board members will promptly investigate the allegations and take appropriate steps to keep the identity of the reporting employee(s) as confidential as possible. Reports of suspected wrongdoing will be kept confidential to the extent that it is possible and consistent with the need to conduct a thorough investigation.

ConnXus will not subject any employee to reprisal, either directly or indirectly, for having made a good faith report of suspected wrongdoing. In addition, anyone who retaliates against an employee for reporting a concern in good faith will be subject to discipline, up to and including termination. If an employee believes he/she is being retaliated against for reporting a concern under this policy, he/she should contact a member of executive management immediately.

ConnXus will ensure all employees are advised of the content of the Whistleblower Policy and will train all employees on the prohibition of retaliation in accordance with this policy.

I, _____ acknowledge receipt of and fully understand this Whistleblower Policy.

Employee's Signature

Date

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5155 FINANCIAL WAY MASON, OH 45040 P: 513.204.2873 F: 513.445.3738 W: CONNXUS.COM



Whistleblower Procedure

Who Can Report

Any employee, contractor or vendor may report allegations of suspected illegal, unethical or inappropriate activities, as defined in the Whistleblower Policy.

Reports in writing are preferred to assure a clear understanding of the issues raised; however reports may be made orally. Such reports should be factual rather than speculative or conclusive, and contain as much specific information as possible to allow for proper assessment of the nature, extent and urgency of investigative procedures and actions.

Any questions regarding the Whistleblower Policy and Procedure should be directed to the Chief Compliance Officer, in the event the Chief Compliance Officer is not available, then to the full Compliance Committee. Compliance Committee members are: Daryl Hammett (Chief Compliance Committee), Carrie Hof, and Robin Shabazz.

Reports By Employees

All employees are protected from retaliation for making reports under the Whistleblower Policy.

Anonymous Reports

Whistleblower reports may be made anonymously. Anonymous reports must provide sufficient information to justify the commencement of an investigation. Anonymous whistleblowers should be aware that the inability of investigators to interview them might result in difficulty evaluating the allegations.

Where to File

Oral or written reports may be directed to any of the following:

- Your immediate supervisor
- Any level of management above your immediate supervisor
- The Chief Compliance Officer and/or the Compliance Committee
- The Board of Directors
- feedback@connxus.com
- ConnXus Inc, 9378 Mason Montgomery Rd, Box #303, Mason OH 45040

Content of Whistleblower Report

In providing information, the employee is not to conduct any investigative procedures or obtain information for which he or she does not have a right of access. Doing so may constitute a violation of law or ConnXus policy. The best information the employee can provide is specific facts about the nature of the complaint (i.e., who, what, when, where, how, etc.).

Investigation Process

When a member of management receives a Whistleblower Report, he/she must immediately act to resolve the matter by informing the Compliance Committee, and respond to the whistleblowing employee within forty-eight (48) hours of receipt of the Report to acknowledge receipt. The Compliance Committee will investigate or assign the Whistleblower Report to an independent investigator who will conduct the investigation. Every attempt will be made to conduct an investigation and resolve the issue within 14 days of receipt of the reported concern.

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