

## Whistleblower Protection Policy

RMHC requires employees, directors, and officers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Employees and representatives of RMHC must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

The objectives of RMHC's Whistleblower Policy are to establish policies and procedures for:

- The submission of concerns regarding questionable accounting or audit matters, unlawful activity, or activity not in line with RMHC's ethical business policies by employees, officers, and directors on a confidential and anonymous basis.
- The receipt, retention and treatment of complaints received by RMHC.
- The protection of employees reporting concerns from retaliatory actions.

Each employee of RMHC has an obligation to report, in accordance with this Whistleblower Policy, questionable or improper accounting or auditing matters and any evidence of illegal, fraudulent, dishonest, negligent or otherwise unethical action arising in connection with RMHC operations or activities (hereinafter collectively referred to as "Concerns"). Employment-related concerns should continue to be reported through managers and the CoS.

The Whistleblower Policy is intended to encourage and enable employees to raise Concerns within RMHC for investigation and appropriate action. With this goal in mind, no employee who, in good faith, reports a Concern shall be subject to retaliation or adverse employment consequences. Moreover, an employee who retaliates against someone who has reported a Concern in good faith is subject to discipline up to and including termination of employment.

Employees should submit Concerns to the CoS or the CEO (the "Receiving Official"). If the Concern is reported verbally to the Receiving Official, then the Receiving Official shall, with assistance from the reporting individual, reduce the Concern to writing. The Receiving Official shall promptly report the

Concern to the proper investigating authority as follows:

- For Concerns relating to accounting, internal controls, or audit matters (Financial Concerns), the investigating authority is the Audit Committee. Such concerns shall be submitted to the Chair of the Audit Committee.
- For Concerns relating to any illegal, fraudulent, dishonest, negligent, or otherwise unethical action not financially related (Non-Financial Concerns), unless the Concern involves the CEO, the investigating authority is the CEO. Such Concerns shall be submitted to the CEO.
- For Non-Financial Concerns that involve the CEO, the investigating authority is the Executive Committee. Such Concerns shall be submitted to the Chairman of the Executive Committee.

If the Receiving Official, for any reason, does not promptly forward the Concern to the appropriate investigating authority, the reporting individual should directly report the Concern to such person. Contact information for the Chair of the Audit Committee, the CEO, and the Chairman of the Executive Committee can be obtained from the CoS.

Notwithstanding the above reporting procedures, Concerns may also be submitted anonymously. Such anonymous Concerns should be in writing and contain sufficient factual information for RMHC to conduct an appropriate investigation. Such Concerns should be directed to the appropriate investigating authority outlined above.

The investigating authority (Audit Committee, CEO or Executive Committee) shall address any reported Concern. The investigating authority shall notify the sender and acknowledge receipt of the Concern within five business days, if possible. It will not be possible to acknowledge receipt of anonymously submitted Concerns.

The investigating authority shall promptly investigate all such reports, and appropriate corrective action shall be recommended to the Board of Directors, if warranted by the investigation. The amount of contact between complainant and the person(s) investigating the Concern will depend on the nature of the issue and the clarity of information provided. Further information may be sought from or provided to the person reporting the Concern.

Reports of Concerns, and investigations pertaining thereto, shall be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.