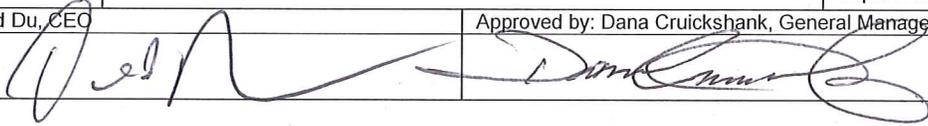


DUTEK	DUTEK POLICY	Page 1 of 2
Doc. #: DP-7.1.4.1	WHISTLEBLOWER POLICY	Revision: A
Effective Date: 12/09/16		Supersedes:
Approved by: David Du, CEO	Approved by: Dana Cruickshank, General Manager	
		

1.0 Purpose and Scope:

- 1.1 The aim of this policy is to ensure that employees, suppliers, suppliers' employees and contractors are fully aware that they should report concerns or suspicions about any activity that she/he considers to be illegal, unethical, dishonest, or fraudulent, on the part of any employee of Dutek, and be assured that any information received will be treated seriously and, where possible, confidentially.
- 1.2 Dutek conducts its business with high standards of integrity and honesty and expects the same standards from all employees, suppliers and contractors.

2.0 Definitions:

- 2.1 A whistleblower, as defined by this policy, is an employee, supplier, or contractor of Dutek who reports an activity she/he considers to be illegal, unethical, dishonest, or fraudulent to one or more of the parties specified in this Policy. The whistleblower is not responsible for investigating the activity or for determining fault or corrective measures; appropriate management officials are charged with these responsibilities.
- 2.2 Examples of illegal, unethical, dishonest, or fraudulent activities are:
- 2.2.1 A criminal offence
 - 2.2.2 A failure to comply with a legal obligation
 - 2.2.3 Violations of federal, state or local laws
 - 2.2.4 A danger to the health and safety of an individual
 - 2.2.5 Dishonesty
 - 2.2.6 Corruption
 - 2.2.7 Bribery
 - 2.2.8 Inappropriate relationships with suppliers
 - 2.2.9 Inappropriate handling of hazardous materials and waste
 - 2.2.10 False accounting or reporting irregularities
 - 2.2.11 A deliberate concealment of any of the above matters

3.0 Policy

- 3.1 If an employee has knowledge of or a concern of illegal, unethical, dishonest, or fraudulent activity, the employee is to contact his/her immediate supervisor, Director of Operations or Director of Quality & Regulatory Affairs. The employee must 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.
- 3.2 A supplier or contractor who has knowledge of or a concern of illegal, unethical, dishonest, or fraudulent activity by a Dutek employee is to contact the Dutek

DUTEK	DUTEK POLICY	Page 2 of 2
Doc. #: DP-7.1.4.1	WHISTLEBLOWER POLICY	Revision: A

Director of Operations or Director of Quality & Regulatory Affairs. Any concerns, complaints or grievances that relate to your company's internal organization, operations and practices should be dealt with formally through your company's normal reporting channels, policies or procedures. Such issues are not covered under Dutek's Whistleblowing Policy.

- 3.3 Employees, suppliers, suppliers' employees and contractors may contact the Director of Operations/Human Resources Manager or Director of Quality & Regulatory Affairs via telephone, email, or an anonymous letter.
- 3.4 Whistleblower protections are provided in two important areas -- confidentiality and against retaliation.
 - 3.4.1 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.
 - 3.4.2 The Company 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 poor work assignments and threats of physical harm.
- 3.5 Any whistleblower who believes she/he is being retaliated against must contact the Director of Operations or Director of Quality & Regulatory Affairs immediately. An employee who retaliates against a whistleblower will be subject to discipline up to and including termination. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.
- 3.6 All reports of an activity that are considered to be illegal, unethical, dishonest, or fraudulent will be promptly submitted to the Vice President, who is responsible for investigating and coordinating corrective action.
- 3.7 Employees, suppliers, or contractors with any questions regarding this policy should contact the Dutek Human Resources Manager.
- 4.0 Contact Information:
 - 4.1 Telephone – (760) 566-8888
 - 4.2 Email – ivan@dutek.com or greg@dutek.com
 - 4.3 Address – 2228 Oak Ridge Way, Vista, CA 92081
- 5.0 Revision History

Revision	Revision Date	Paragraph(s)	Description
A	12/09/2016	All	Initial Release