



## **NON-RETALIATION POLICY**

(v.1, Feb. 2019)

At JCM Engineering Corporation (“JCM” or the “Company”), we strive to nurture and maintain an ethical and safe workplace environment in which employees are encouraged to ask questions about ethics and compliance issues and to report concerns about suspected misconduct without any fear of retaliation. The purpose of this policy is to reinforce that all employees are obligated to report their suspicions of misconduct and to remind employees of JCM’s non-retaliation policy.

As set forth in JCM’s Code of Business Ethics and Conduct (“Code”), JCM prohibits anyone from retaliating against an employee who reports, in good faith, known or suspected violations of the law, regulation, the Code, or other company policies. Our commitment to non-retaliation assures you that in posing any question, raising any concern, reporting suspected misconduct, or cooperating in any investigation, you will not suffer any negative consequences for doing so. JCM employees who engage in retaliation or intimidation in violation of this non-retaliation policy will be subject to disciplinary action, up to and including termination.

JCM offers many communication channels for reporting known or suspected violations of the Code, law, or regulations. While we hope that you always feel comfortable raising concerns or questions directly with your supervisor, the ECO, or the CEO/President, you can report a concern anonymously using the Ethics Helpline. To use the Ethics Helpline, you have several options, including:

- Telephone at **(833) 290-0001** (English speaking) and **(800) 216-1288** (Spanish speaking);
- Website at **[www.lighthouse-services.com/jcmcorp](http://www.lighthouse-services.com/jcmcorp)**;
- E-mail at **[reports@lighthouse-services.com](mailto:reports@lighthouse-services.com)** (must include Company name with your report); or
- Fax at **(215) 689-3885** (must include Company name with report).

In raising any question or reporting any concern, or cooperating with any investigation, you must act in good faith and shall not report information you know to be incorrect. You do not need to be right and are encouraged to report any concerns, regardless of whether you have all the pertinent information. Any employee who makes an intentionally inaccurate, misleading, or false report will be subject to disciplinary action.