



F.I.S.H. of Sanibel-Captiva, Inc.

**POLICY RELATING TO THE
PROTECTION OF WHISTLE BLOWERS**

On January 1, 2018, F.I.S.H.'s Board of Directors adopted a policy relating to the protection of Whistle Blowers, the text of which is set forth below. A copy of this policy will be provided to each employee, as well as any future employee of F.I.S.H., along with a copy of the Employee Handbook. A copy of this policy will be provided in writing to any other F.I.S.H. Worker (as defined in paragraph 2 below) at the commencement of the F.I.S.H. Worker's position with F.I.S.H.

1. Any F.I.S.H. Worker (as defined in paragraph 2 hereof) shall be deemed to be a "Whistle Blower" hereunder if such F.I.S.H. Worker reasonably knows or believes that another F.I.S.H. Worker(s) is guilty of conduct constituting fraud or other misconduct which is a violation of Federal or State of Florida civil, criminal, or administrative laws or regulations, and has filed a complaint against such F.I.S.H. Worker(s) in accordance with the requirements of applicable Federal or State civil, criminal or administrative law.
2. It is the declared and specific intention and policy of F.I.S.H. that no officer, director, advisor, supervisor, regular or temporary employee, outside consultant (including a member or employee of the firm which conducts the outside or annual audit of F.I.S.H., attorney or employee of an attorney) doing work on behalf of F.I.S.H., volunteer worker of F.I.S.H. or other agent (each a "F.I.S.H. Worker") shall knowingly, with intent to retaliate or harm any other F.I.S.H. Worker, including the threatening of, or interference with the lawful employment or livelihood of the Whistle Blower by reason of the Whistle Blower having providing to a supervisor, employee, officer or director of F.I.S.H., or any law enforcement, administrative or investigative officer, or agency of the State of Florida or Federal Government, any truthful information relating to the commission or violation of any applicable civil, criminal or administrative law or regulation, or possible commission of a crime or violation of civil, criminal or administrative law or offense, under the laws of the State of Florida or any civil, criminal, or administrative Federal law or Regulation.

3. Any F.I.S.H. Worker may file a Whistle Blower complaint in good faith as provided for by applicable law. Unless otherwise permitted by applicable law or regulation, the complaint shall be in writing and signed by the Whistle Blower, signed before an officer authorized to take oaths, that to the best of the Whistle Blower's knowledge and belief the matters set forth in the complaint are true and correct. All reports of illegal or dishonest activities shall be promptly submitted to the F.I.S.H. President & Chief Executive Officer or the Board Chair who will investigate and take corrective action.
4. No F.I.S.H. Worker shall at any time destroy, mutilate or change any F.I.S.H. document to prevent such document from being used in an official proceeding.
5. It is the intention of this policy to grant to and confirm to each F.I.S.H. Worker the rights as may be granted to "Whistle Blowers" under the Federal law commonly known as The Sarbanes-Oxley Act, or any subsequent amendment thereto which shall be applicable to F.I.S.H., as well as any other State of Florida or Federal law or regulation that may be enacted or adopted protecting the rights of "Whistle Blowers" which shall relate to F.I.S.H. To the extent that this policy shall restrict any such rights, the rights granted by such laws or regulations shall be deemed to supersede the policies herein adopted.