

NEVADA RESEARCH & INNOVATION CORPORATION

Policy on Reporting and Investigating Allegations of Improper Activities (Whistleblower Policy)

I. Introduction

Nevada Research & Innovation Corporation (the “Corporation”) is committed to lawful and ethical behavior in all of its activities. The Corporation’s directors, officers, employees, volunteers and other agents must act in accordance with all applicable laws, regulations and policies and must observe high standards of business and personal ethics in the conduct of their duties and responsibilities.

Consistent with this commitment, this Policy on Reporting and Investigating Allegations of Improper Activities (this “Policy”) is established to provide a procedure by which directors, officers, employees, volunteers and other agents (individually, a “Party”) may raise concerns regarding illegal or improper conduct by the Corporation, its leadership, or by others with respect to the Corporation. Additionally, this Policy is intended to provide a safeguard against retaliation in connection with the reporting of such a concern.

II. Process for Reporting Concerns

Any Party who wishes to report a concern regarding the propriety or legality of any action or contemplated action relating to the Corporation should do so by:

- Reporting the matter directly to his or her primary manager or contact or, if appropriate, to the next level of management.
- If direct reporting to management is not appropriate, or direct reporting does not result in the concern being fully or properly addressed, the Party may report his or her concern to any officer or director of the Corporation. This may be done on an anonymous basis, if desired.

III. How The Corporation Will Deal with Reported Concerns

The Corporation will treat reports of unethical or illegal conduct as confidential, to the extent that doing so is possible and consistent with the need to investigate and take appropriate actions. No Party will be discharged, threatened or discriminated against in any manner for reporting in good faith what he or she perceives to be illegal or unethical conduct.