



Policy Name:	Whistleblower Protection Policy	
Revision Date:	May 9, 2023	
Approval Authority:	<i>s/Keith Percy</i>	05072024
	President Perimeter Park West, Inc.	Date

Purpose

The Whistleblower Protection Policy is intended to encourage and enable agents and others to raise serious concerns internally so PPW can address and correct inappropriate conduct and actions.

Policy

A. Ethics Standards

Perimeter Park West, Inc. (PPW) requires directors and agents to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Agents and representatives of PPW, must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

B. Reporting Responsibility

It is the responsibility of all board members and agents to report concerns about violations of PPW’s standard of ethics or suspected violations of law or regulations that govern PPW’s operations.

C. No Retaliation

It is contrary to the values of PPW for anyone to retaliate against any board member, officer or agent who in good faith reports an ethics violation, or a suspected violation of law, such a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of PPW. An agent who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including removal as an agent of PPW.

D. Reporting Procedure

PPW has an open door policy and suggests that agents share their questions, concerns, suggestions or complaints with the Legal Agent. If you are not comfortable speaking with the Legal Agent or you are not satisfied with the Legal Agent's response, you are encouraged to speak with the Executive Agent, or the Board Chair. Agents are required to report complaints or concerns about suspected ethical and legal violations in writing to the PPW's Legal Agent who has the responsibility to investigate all reported complaints. Agents with concerns or complaints may also submit their concerns in writing directly to the Executive Agent or the PPW's Board Chair.

E. Compliance Officer/Legal Agent

The PPW's Legal Agent is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Legal Agent will advise the Executive Agent and/or the Board of Directors of all complaints and their resolution and will report at least annually to the Board on compliance activity relating to accounting or alleged financial improprieties.

F. Accounting and Auditing Matters

The PPW's Legal Agent shall immediately notify the Board of any concerns or complaint regarding corporate accounting practices, internal controls or auditing, and work with the Board until the matter is resolved.

G. Acting in Good Faith

Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith, and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated, and which prove to have been made maliciously or knowingly to be false, will be viewed as a serious disciplinary offense.

H. Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violation or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

I. Handling of Reported Violations

The PPW's Legal Agent will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports shall be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.