



U.S. LEGAL SUPPORT, INC.  
WHISTLEBLOWER & CONFIDENTIAL EMPLOYEE HOTLINE POLICY

## Overview and Purpose

U.S. Legal Support (USLS) -- wishing to promote a culture of integrity, ethics and social responsibility -- has established a Whistleblower and Confidential Hotline Policy to facilitate the reporting of issues relating to any one of the following:

- Suspected violations of company policy as outlined in the employee handbook or other official material.
- Suspected illegal or unethical behavior (i.e. harassment, discrimination, coercion, collusion, fraud).
- Breaches of the integrity of financial, accounting, internal control or auditing matters.

## Process

Employees are always encouraged to discuss their concerns or observations with their supervisors, but in the event that circumstances make such discussions impractical or uncomfortable, issues may be reported by any of the following methods:

- By confidential, toll-free voice-mail at 888.261.3761.
- In writing, by U.S. mail, addressed to U.S. Legal Support, Inc., Ethics Office, 16825 Northchase Drive, Suite 900, Houston, TX 77060.
- By email to [whistleblower@uslegalsupport.com](mailto:whistleblower@uslegalsupport.com).

A committee that includes at least two of the following: (1) the Human Resources Vice President, (2) the Chief Financial Officer, (3) USLS's independent General Council – is responsible for evaluating all reports and responding to any issue raised as a result of this policy, and if necessary advising appropriate company personnel. Any serious or pertinent matters will be presented to USLS's Board of Directors.

## Content of Reports

To help in the response to, or investigation of, an issue, the report should be factual rather than speculative, and contain as much specific information as possible to allow for proper assessment of the nature, extent and urgency of the matter. Reports that contain unspecified wrongdoing or broad allegations without verifiable evidentiary support will be less likely to result in an investigation.

Specifically, the report should, to the extent possible, contain the following information:

- A detailed description of the alleged event, matter or issue that is the subject of the report.
- The name of each person involved.
- The approximate date and location of each event, if the issue involves a specific event or events.
- Any additional information, documentation or other evidence available to support the report.

## Retention of Reports

Written copies of all issues raised will be retained by USLS and/or the Board of Directors (as appropriate) in a Whistleblower Hotline file.



### **Confidentiality/Anonymity**

USLS shall protect the confidentiality and anonymity of the person making the report to the fullest extent reasonably practicable within the legitimate needs of the law and of any ensuing evaluation or investigation. Legal or business requirements may not allow for complete anonymity, and in some cases, it may not be possible to proceed with or properly conduct an investigation unless the complainant identifies himself or herself. In addition, persons making reports should be cautioned that their identity might become known for reasons outside of the control of USLS. It may be less likely that an investigation will be initiated in response to an anonymous report due to the difficulty of interviewing anonymous reporters. The identity of other persons subject to, or participating in, any inquiry or investigation relating to an issue shall be maintained in confidence subject to the same limitations.

### **Protections from Retaliation**

Employees shall be protected from retaliation for having, in good faith, made a report; disclosed information relating to a report or otherwise participated in an investigation relating to a report. USLS shall not discharge, demote, suspend, threaten, harass or in any manner discriminate against an employee in the terms and conditions of employment based upon any lawful actions of such employee with respect to good faith reporting of issues, participation in a related investigation. An employee's right to protection from retaliation does not extend immunity for any complicity in the matters that are the subject of the Complaint or an ensuing investigation.

This policy is in no way intended to limit the rights of employees to report alleged violations or misconduct to proper governmental and regulatory authorities.