

WHISTLEBLOWER POLICY

NERVA requires directors, officers, and employees to observe high standards of ethical behavior in the conduct of their duties and responsibilities. As representatives of NERVA, all such persons must practice honesty and integrity in fulfilling their responsibilities, and they must comply with all applicable laws and regulations. Reporting Responsibility This Whistleblower Policy is intended to enable employees and others to raise serious concerns internally rather than remaining silent or seeking resolution outside NERVA, so that NERVA can address and correct inappropriate conduct and actions. It is also the responsibility of all directors, officers, and employees to comply with all NERVA policies and to report material or suspected violations of law or regulations that govern NERVA's operations.

No Retaliation - No director, officer or employee who in good faith reports inappropriate conduct or actions, or a suspected violation of law or regulations, shall suffer harassment, retaliation or adverse consequences. An employee who retaliates against someone who has reported inappropriate conduct or actions or a violation of law or regulations in good faith is subject to discipline up to and including termination of employment. Reporting Procedure NERVA has an open door policy and suggests that employees share their questions, concerns, suggestions or complaints with their supervisor. If you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with any of the Executive Committee members, specifically, any of the President, Vice President, Treasurer or Secretary of NERVA (each, a "Compliance Officer"). Supervisors and the Executive Director are required to report complaints or concerns about suspected ethical and legal violations in writing to an NERVA Compliance Officer, who has the responsibility to inform the remaining Executive Committee members of such complaints or concerns, and the Executive Committee shall have the responsibility to investigate all reported complaints. Employees with concerns or complaints may also submit their concerns in writing directly to their supervisor, the Executive Director, or any of the Compliance Officers. Executive Committee NERVA Executive Committee is responsible for investigating and resolving all reports concerning inappropriate, unethical or illegal conduct and shall promptly advise the full Board of Directors of such reports and of their findings. In addition, they are required to report to the Board at least annually on compliance activity relating to any accounting or alleged financial improprieties. Acting in Good Faith Anyone making a report concerning inappropriate, unethical or illegal conduct must be acting in good faith and have reasonable grounds for believing the information disclosed indicates inappropriate conduct or actions, or a violation of law or regulations. Any untrue reports which prove to have been made maliciously or knowingly to be false, will be viewed as serious disciplinary offenses. Confidentiality Inappropriate, unethical or illegal conduct may be reported on a confidential basis by the complainant or may be submitted anonymously. Such reports will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. Any report submitted anonymously must provide sufficient supporting data to permit meaningful follow up. Reports submitted anonymously that are vague, ambiguous or unsupported will be disregarded. Handling of Reported Violations A Compliance Officer will promptly acknowledge receipt of non-anonymous reports. All reports will be promptly investigated, and appropriate corrective action will be taken as soon as possible