

SHAOHANNAH'S HOPE, Inc.
PERSONNEL POLICY AND PROCEDURES
As of June 2009

Policy on Suspected Misconduct, Dishonesty, Fraud, and Whistle-blower Protection

Shaohannah's Hope is committed to the highest possible standards of ethical, moral, and legal conduct. Consistent with this commitment, this policy aims to provide avenues for employees to raise concerns about suspected misconduct, dishonesty, and fraud and to provide reassurance that they will be protected from reprisals or victimization for whistle-blowing in good faith.

PROCEDURE

Reporting

Employees and any other person who has a concern relating to suspected misconduct, dishonesty or fraud may make a report. The Shaohannah's Hope Ministry wants to hear of possible problems in these areas.

Concerns or suspected misconduct, dishonesty or fraud may be reported by telephone, email or regular mail, at the employee's or reporter's preference:

An employee can email or call directly the Chairman of the Audit Committee at:

Leslie Maclellan

leslie@maclellanlaw.com

615-838-9670

Timing

The earlier a concern is expressed, the easier it is to take action.

Investigating the Concern

Following the receipt of any complaints submitted, the Audit Committee Chairman will investigate each matter so reported and take corrective and disciplinary actions where appropriate.

The Audit Committee may enlist committee members, employees of the ministry and/or outside legal, accounting or other advisors, as appropriate, to conduct any investigation of complaints regarding financial reporting, accounting, internal accounting controls, auditing matters, or any other form of misconduct, dishonesty, or fraud. In conducting any investigation, the Audit Committee shall use reasonable efforts to protect the confidentiality and anonymity of the complainant.

Further Information

The amount of contact between the complainant and the body investigating the concern will depend on the nature of the issue and the clarity of information provided. Further information may be sought from the complainant.

Report to Complainant

The complainant will be given the opportunity to receive follow-up on their concern within two weeks:

- Acknowledging that the concern was received;
- Indicating how the matter will be dealt with;
- Giving an estimate of the time that it will take for a final response;
- Telling them whether initial inquiries have been made; and
- Telling them whether further investigations will follow, and if not, why.

Information

Subject to legal constraints the complainant will receive information about the outcome of any investigations.

Document Retention

The Audit Committee shall retain as a part of the records of the Committee any such complaints or concerns for a period of at least seven years.

SAFEGUARDS

No Retaliation

No director, officer, or employee or other person who in good faith reports a violation shall suffer harassment, retaliation or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This policy is intended to encourage and enable employees and others to raise concerns within the organization prior to seeking resolution outside the organization.

Additionally, no employee shall be adversely affected because they refuse to carry out a directive which, in fact, constitutes corporate fraud, or is a violation of state or federal law.