

EXHIBIT J3

WHISTLEBLOWER POLICY

The High Alert Institute, Inc. requires directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the The High Alert Institute, Inc., we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that The High Alert Institute, Inc. can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees and volunteers to report concerns about violations of The High Alert Institute, Inc.'s code of ethics or suspected violations of law or regulations that govern The High Alert Institute, Inc.'s operations.

No Retaliation

It is contrary to the values of The High Alert Institute, Inc. for anyone to retaliate against any board member, officer, employee or volunteer who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of The High Alert Institute, Inc.. 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.

Reporting Procedure

The High Alert Institute, Inc. 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 [insert here another title, such as Executive Director, or a board member, if the organization is very small and involving the board would be appropriate]. Supervisors and managers are required to report complaints or concerns about suspected ethical and legal violations in writing to the The High Alert Institute, Inc.'s Vice-Chairperson of the Board, who has the responsibility to investigate all reported complaints. Employees with

concerns or complaints may also submit their concerns in writing directly to their supervisor or the Executive Director or the organization's Vice-Chairperson of the Board.

Compliance Officer

The High Alert Institute, Inc.'s Compliance Officer is the Vice-Chairperson of the Board and is the person responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Compliance Officer will advise the Executive Director and/or the Board of Directors of all complaints and their resolution and will report at least annually to the Treasurer/Secretary on compliance activity relating to accounting or alleged financial improprieties.

Accounting and Auditing Matters

The The High Alert Institute, Inc.'s Compliance Officer shall immediately notify the Treasurer/Secretary and the Board of Directors of any concerns or complaint regarding corporate accounting practices, internal controls or auditing and work with the committee until the matter is resolved.

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.

Confidentiality

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

Handling of Reported Violations

The High Alert Institute, Inc.'s [Compliance Officer] will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports

will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

Compliance Officer Contact Information Effective 30 May 2022:

Heidi Cordi, M.D., M.P.H.
Vice-Chairperson of the Board
4800 Ben Hill Trail
Lake Wales, FL 33898
HCordi@HighAlertInstitute.org
914-621-6080

Policy approved by the Board of Directors on 18 Feb 2018

Policy Updated and Reaffirmed by the Board of Directors 30 May 2022.