

**39 ALPHA RESEARCH
WHISTLEBLOWER POLICY**

The Whistleblower Policy (this “Policy”) is intended to encourage and enable employees and others to raise serious concerns within 39 Alpha Research (the “Corporation”) Corporation prior to seeking resolution outside the Corporation. There will be no punishment or other retaliation for the reporting of conduct pursuant to this Policy. If the person providing the information requests anonymity, the request will be respected to the extent that doing so does not impede an investigation.

The Corporation promotes ethical conduct, transparency and compliance with the law and requires directors, officers, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Should any person know of, or have a suspicion about, illegal or unethical conduct in connection with the finances or other aspect of its operations, that person should inform the President. If the alleged wrongdoing concerns the President, then another officer or director should be notified instead.

Should the President or another officer or director receive information regarding alleged illegal or unethical conduct in connection with the finances or other aspect of operations, those officers or directors shall inform the full Board of Directors (the “Board”). The Board shall investigate all credible allegations and, at all times, respect the privacy and reputation of individuals involved.

CHANGES TO THE POLICY

This Whistleblower Policy has been reviewed and accepted by the Board. The Board must approve any changes to or deviations from this Policy.

CERTIFICATE OF ADOPTION

The foregoing Whistleblower Policy was duly adopted by the Board of Directors effective as of the _____ day of _____, 2020.

39 ALPHA RESEARCH

Douglas Moore, Secretary