

WHISTLE BLOWING POLICY

BHI Holdings, Inc. (the Company) requires directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities.

Reporting Responsibility

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally. It is the responsibility of all directors, officers, and employees to report concerns about violations of the code of ethics or suspected violations of law or regulations of the Company.

No Retaliation

It is contrary to the values of the Company for anyone to retaliate against directors, officer, and employees who in good faith reports an ethics violation. 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

Directors and Officers are required to report complaints or concerns about suspected ethical and legal violations in writing to the designated Committee who has the responsibility to investigate all reported complaints. Employees with concerns or complaints may also submit their concerns in writing directly to the Board of Directors or the organization's Compliance Officer or other designated person as maybe designated by the Board of Directors.

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

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