

Whistleblower Policy

Any employee may submit a good faith complaint, report, or concern regarding accounting, auditing or other matters as set forth below relating to PIRE, to the designated outside consultant, the Chair of the Audit Committee of the Board of Directors, or Executive Management of PIRE, without fear of separation because of said action or retaliation of any kind with respect to such action.

In the event that irregularities occur with respect to issues not stated within this policy, other established procedures may be followed.

To facilitate reporting, PIRE has established the following procedures for (a) the receipt, retention, and treatment of complaints, reports, and concerns regarding financial statement disclosures, accounting, internal controls, or auditing matters (collectively, “Accounting Matters”), and (b) the confidential, anonymous submission of complaints, reports, and concerns by employees and other persons regarding Accounting Matters.

Scope of Matters Covered by Procedures

The Audit Committee shall receive, retain, and may investigate and/or act on all Accounting Matters reported by employees.

Upon receipt of a complaint, report, or concern relating to any Allegation or Retaliatory Act, or notification by PIRE, an executive officer, or member of the Board of Directors that it (or they) has received such a complaint, report, or concern, the Chairperson of the Audit Committee will notify the other members of the Audit Committee promptly.

The Audit Committee will then investigate the complaint, report, or concern, as appropriate, given the severity of the complaint, report or concern, in a timely fashion. In conducting such investigation, the Audit Committee may enlist officers or employees of PIRE and /or outside legal, accounting, or other advisors, as appropriate. Following the completion of such investigation, the Audit Committee will recommend that the Board of Directors take such corrective and disciplinary actions, if any, that are warranted in the judgment of the Audit Committee, which may include, without limitation, a warning or letter of reprimand, demotion, salary reduction, loss of eligibility for a salary increase, bonus, suspension without pay, or termination of employment.

Confidentiality with respect to all complaints, reports, and concerns will be maintained by PIRE and members of the Audit Committee to the extent reasonably possible, consistent with the need to conduct an adequate review.

PIRE will not take any adverse action against anyone as a result of their submission of a good faith complaint, report, or concern pursuant to these procedures and will not separate, demote, suspend, threaten, harass, or in any manner discriminate against any employee in the terms and conditions of employment, based upon any lawful actions taken by the employee with respect to

good faith reporting of complaints, concerns, or other matters. Additionally, no employee shall be adversely affected because the employee refuses to carry out a directive which, in fact, constitutes corporate fraud, or is a violation of state or federal law. The Audit Committee may report findings of its investigations to relevant agencies as appropriate.

Receipt of Complaints, Reports, or Concerns

Any person with complaints, reports, or concerns regarding any allegation or retaliatory act may submit such complaints, reports, or concerns on a confidential or anonymous basis to the Audit Committee by:

1. writing or verbally notifying the Chair of the Audit Committee; or
2. writing or verbally notifying PIRE's general counsel (currently Ronald Dweck, of Paley, Rothman et al, 4800 Hampden Lane, Suite 700, Bethesda, MD 20814, Telephone 301-951-9329); or
3. writing or verbally notifying PIRE's external provider of anonymous incident reporting, Lighthouse Services, Inc., via mail (1128 Wheatsheaf Road, Abington, PA 19001); email (reports@lighthouse-services.com); phone (1-800- 398-1496, English Speaking; 1-800-216-1288, Spanish Speaking), or web (www.lighthouse-services.com, click "Report Incident" then enter user id: PIRE, password: research).

Any written communication should indicate that it is being delivered pursuant to these whistleblower procedures and contain a complete description of the facts or circumstances giving rise to the complaint, report, or concern. In addition, any communication (whether written or oral) may, but need not, include a telephone number, e-mail address, or mailing address at which the person submitting the complaint, report, or concern may be contacted if the Audit Committee or its Chairperson desires clarification or further information.

Further, PIRE, any Officer, or any member of the Board of Directors must promptly forward to the Chairperson of the Audit Committee any complaints, reports, or concerns regarding any allegation or retaliatory act that have been communicated to it (him or her).

Retention of Documentation Relating to Complaints, Reports, and Concerns

The Audit Committee shall retain via Corporate Counsel, as part of the records of the Audit Committee, any complaints, reports, and concerns submitted or received pursuant to these procedures, as well as any documentation relating to the investigation and resolution of such complaints, reports, or concerns, as legally required.