

**OTIX GLOBAL, INC.**  
**FINANCIAL INFORMATION INTEGRITY POLICY**

## **1. INTRODUCTION**

As a public company, the integrity of the financial information of Otix Global, Inc. (the “*Company*”) is paramount. The Company’s financial information guides the decisions of the Board of Directors (the “*Board*”) of the Company and is relied upon by our shareholders and the financial markets. For these reasons, we must maintain a workplace where employees, when they reasonably believe that they are aware of questionable accounting, disclosure or internal accounting controls, auditing matters, or the reporting of fraudulent financial information, can raise these concerns free of any discrimination, retaliation or harassment.

Therefore, it is the policy of the Company to encourage employees, when they reasonably believe that questionable accounting or auditing conduct or practices have occurred or are occurring, to report those concerns to their immediate supervisor or the Chief Accounting Officer (“CAO”) or the Chief Financial Officer (“CFO”). Alternatively, any employee may raise those concerns by contacting the Chief Executive Officer (“CEO”) or a member of the Audit Committee of the Board. This can be done anonymously, if desired, simply by leaving a voicemail or sending an email or letter to any of the persons named above. Contact information is provided in Section 5. All reports will be taken seriously and will be promptly investigated. The specific action taken in any particular case depends on the nature and gravity of the conduct or circumstances reported, and the quality of the information provided. Where questionable accounting or auditing conduct or practices have occurred, or fraudulent financial information has been reported, those matters will be corrected and, if appropriate, the persons responsible will be disciplined.

In addition, the Company is committed to providing a work environment in which employees, when they reasonably believe that questionable accounting or auditing matters have occurred, or that fraudulent financial information has been reported, can raise those concerns free of discrimination, retaliation or harassment. Accordingly, the Company strictly prohibits discrimination, retaliation or harassment of any kind against any employee who, based on the employee’s reasonable belief that such conduct or practices have occurred or are occurring, reports that information.

## **2. REPORTING AND INVESTIGATION**

If you have reason to believe that you have become aware of questionable accounting or auditing matters, or the reporting of fraudulent financial information, you must immediately report those facts to your immediate supervisor or to the CAO or CFO. You may then be requested to document your report in writing. If you have reason to believe that any of these individuals are involved in these matters or, if for any reason, you do not feel comfortable discussing the matter with these individuals, you should report the matter to the CEO or a member of the Audit Committee. It is imperative that you bring the matter to the Company’s

attention promptly so that any concern can be investigated and addressed promptly and appropriately.

All complaints under this policy will be promptly and thoroughly investigated, and all information disclosed during the course of the investigation will remain confidential, except as necessary to conduct the investigation and take any remedial action, in accordance with applicable law. All employees and supervisors have a duty to cooperate in the investigation of reports of questionable accounting or auditing matters, or the reporting of fraudulent financial information, or of discrimination, retaliation or harassment resulting from the reporting or investigation of such matters. In addition, an employee shall be subject to disciplinary action, up to and including the termination of employment, if the employee fails to cooperate in an investigation, or deliberately provides false information during an investigation. If, at the conclusion of its investigation, the Company determines that a violation of policy has occurred, the Company will take effective remedial action commensurate with the severity of the offense, which may include disciplinary action against the accused party, up to and including termination of employment. Reasonable and necessary steps will also be taken to prevent any further violations of policy.

### **3. DISCRIMINATION, RETALIATION OR HARASSMENT**

The Company strictly prohibits any discrimination, retaliation or harassment against any person who reports incidents of questionable accounting or auditing matters, or the reporting of fraudulent financial information, based on the person's reasonable belief that such misconduct occurred. The Company also strictly prohibits any discrimination, retaliation or harassment against any person who participates in an investigation of complaints about questionable accounting or auditing matters, or of the reporting of fraudulent financial information.

Any complaint that any managers, supervisors, or employees are involved in discrimination, retaliation or harassment related to the reporting or investigation of questionable accounting or auditing matters, or the reporting of fraudulent financial information, shall be promptly and thoroughly investigated. If a complaint of discrimination, retaliation or harassment is substantiated, appropriate disciplinary action, up to and including termination of employment, will be taken.

### **4. ADDITIONAL ENFORCEMENT INFORMATION**

In addition to the Company's internal complaint procedure, employees should also be aware that certain federal and state law enforcement agencies are authorized to review questionable accounting or auditing matters, or potentially fraudulent reports of financial information. The Company's policies and practices have been developed as a guide to our legal and ethical responsibilities to achieve and maintain the highest business standards. Conduct that violates the Company's policies will be viewed as unacceptable under the terms of employment at the Company. Certain violations of the Company's policies and practices could even subject the Company and any individual employees involved to civil and criminal penalties. Before issues or behavior can rise to that level, employees are encouraged to report questionable accounting or auditing matters, suspicion of fraudulent financial information, or discrimination, retaliation or harassment related to such reports. Nothing in this policy is intended to prevent an

employee from reporting information to the appropriate agency when the employee has reasonable cause to believe that the violation of a federal or state statute or regulation has occurred.

## **5. CONTACT INFORMATION**

<b>Title</b>	<b>Name</b>	<b>Phone</b>	<b>Fax</b>	<b>Email</b>
CEO	Sam Westover	801-312-1700	801-312-1702	<a href="mailto:swestover@sonici.com">swestover@sonici.com</a>
CFO	Mike Halloran	801-312-1717	801-312-1702	<a href="mailto:mhalloran@sonici.com">mhalloran@sonici.com</a>
CAO	Scott Lindeman	801-312-1722	801-312-1702	<a href="mailto:slindeman@sonici.com">slindeman@sonici.com</a>

### **Audit Committee**

Chairman	Craig McKnight	(303) 549-2314	<a href="mailto:craig@cmcknight.com">craig@cmcknight.com</a>
Member	Robert Miller	(404) 352-0475	<a href="mailto:robwmiller2@comcast.net">robwmiller2@comcast.net</a>
Member	James Callahan	(678)-485-0483	<a href="mailto:bonjimcal@hotmail.com">bonjimcal@hotmail.com</a>