# Whistleblowing Policy

## Introduction

This Whistleblowing Policy is established to guide reporting suspected unethical, illegal, or fraudulent activities by employees, agents, vendors, or others, without fear of retaliation. ***[Organization name]*** is committed to maintaining high ethical standards and encourages employees and others who identify improper conduct to report such conduct to the appropriate individuals within the organization.

## Purpose

A Whistleblowing policy promotes a positive workplace culture by allowing employees to voice concerns and address issues, enhancing employee morale and job satisfaction. The policy encourages employees, agents, vendors, or others to report suspected unethical, illegal, or fraudulent activities without fear of retaliation. It establishes a process for investigating reports of suspected misconduct, which enables the company to identify any issues and take appropriate actions to address them. Overall, it is an essential tool to foster an ethical and transparent workplace culture, detect and prevent misconduct, and protect the company's interests and reputation.

## Scope

The Whistleblowing policy covers suspected unethical, illegal, or fraudulent activities by employees, agents, vendors, or others with a business relationship with the company. It includes accounting and financial matters, health and safety concerns, human resource matters, data privacy and security concerns along with environmental matters. The policy applies to all employees, agents, vendors, or others with a business relationship with the company, including all company-owned facilities and business operations, both domestic and international. Reports can be made anonymously, as long as the information reported is specific and credible. The policy aims to encourage reporting of suspected misconduct and ensure appropriate action is taken to address any issues identified.

## Policy Details

### **Reporting Suspected Misconduct**

Employees, agents, vendors, or others who know about suspected unethical, illegal, or fraudulent activities are encouraged to report such activities promptly. Reports may be made verbally or in writing anonymously if the individual chooses.

Reports of suspected misconduct should be made to one of the following individuals:

* The employee's supervisor
* The Human Resources Department
* The Legal Department
* The Compliance Department

### **Investigating Reports of Suspected Misconduct**

Upon receipt of a report of suspected misconduct, the organization will promptly investigate the matter. The investigation will be conducted promptly, thoroughly, and confidentially. The investigation may involve interviews with individuals who may know about the suspected misconduct, reviewing relevant documents, and other investigative techniques as appropriate.

### **Protecting Confidentiality**

The organization will protect the confidentiality of individuals who report suspected misconduct to the extent possible. However, in some cases, the organization may need to disclose the identity of the individual who made the report to investigate the matter or comply with legal requirements thoroughly.

### **No Retaliation**

The organization prohibits retaliation against any employee or other individual who reports suspected misconduct or participates in an investigation or other proceedings related to such reports. Retaliation may include but is not limited to, adverse employment actions such as termination, demotion, suspension, harassment, or discrimination.

## Related Laws and Regulations

The Whistleblowing Policy at ***[Organization Name]*** is compliant with the following laws and regulations:

* The Whistleblower Protection Act (WPA)
* The Sarbanes-Oxley Act (SOX)
* The False Claims Act (FCA)
* The Dodd-Frank Wall Street Reform and Consumer Protection Act

## Disciplinary Action

The organization takes all reports of suspected misconduct seriously and will take appropriate disciplinary action against any employee or other individual engaging in unethical, illegal, or fraudulent activities. Disciplinary action may include but is not limited to, termination of employment, suspension, demotion, or other appropriate action.

## Declaration

I, ***[Employee Name]***, acknowledge that it is my responsibility to report any illegal or unethical behavior I witness within the organization. I understand that I must report such behavior to protect the best interests of the organization, its stakeholders, and the public.

I am committed to upholding the highest standards of ethical conduct and contributing to a culture of transparency and accountability within the organization. I recognize that my actions as an employee impact the organization's reputation, and I will do my best to always act in the organization's best interests.

I understand that this policy protects whistleblowers against retaliation and that the organization will take appropriate action against any employee who violates this policy. I will comply with this policy and related procedures and promptly report any suspected violations.

By signing below, I acknowledge that I have read and understood this policy and am committed to upholding its principles and values.

**Signed: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Date: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**