

## **Whistleblower Policy & Process**

It is the responsibility of all employees to comply with GPI's Code of Ethics and report any known or suspected violations accordingly. All reporting will remain confidential.

Employees are directed to share their concerns, suggestions, or complaints with someone who can address them properly. Areas of concern should first be addressed with the person(s) in question and/or the employee's direct supervisor. If this is not resolved between the person(s) in question and/or the employee's direct supervisor, then they should be addressed with the Director.

Employees may report knowledge or suspicion of violations through any preferable means. Verbal and anonymous reports are acceptable; however, providing written documentation and/or informant identification may significantly strengthen and expedite an investigation.

Employees who receive any retaliatory action for reporting a violation in good faith should immediately contact the Director. This policy is intended to encourage and enable employees to raise serious concerns within GPI.

Employees who engage or participate in the investigation of a reported violation will be offered the same protection as employees who report violations. Under no circumstance should an employee conduct an investigation on a matter which involves him/her directly.

Anyone filing a complaint concerning a violation or suspected violation of this policy must be acting in good faith, and have reasonable grounds for believing the information disclosed indicates a violation of the policy. Individuals must be mindful to avoid making baseless allegations, particularly with reckless disregard for truth or falsity. The act of reporting malicious or knowingly false allegations will be considered a serious offense. This offense may result in discipline, up to and including termination.

The parties conducting the investigation will notify the complainant and acknowledge receipt of a reported or suspected violation within 5 business days of the initial complaint. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation. All involved individuals will be notified of the investigative results.