



GARRISON INSTITUTE

WHISTLE-BLOWER POLICY

A whistle-blower under this policy is an employee, director or volunteer of the Garrison Institute who reports an activity that they consider to be improper, illegal, or dishonest, to one or more of the parties specified below in this policy. The policy is intended to encourage an employee to raise concerns within the Institute so that they may be investigated, and appropriate action taken. The appropriate senior management officials have the responsibility of investigating the activity and determining further action. Examples of improper, illegal or dishonest activities include, but are not limited to violations of laws; forgery or alteration of documents; unauthorized manipulation of computer files; fraudulent financial reporting; pursuit of a benefit or advantage in violation of the Policies Related to Conflict of Interest; or misappropriation or misuse of the Institute's resources, such as funds, supplies or other assets.

If you have knowledge of or a concern regarding improper, illegal, or dishonest activity, please contact any one of the following parties:

- your supervisor;
- the Director, People & Operations;
- the Executive Director;
- the Audit Committee of the Board of Directors; or
- a member of the Board of Directors.

Whistle-blowers are protected against retaliation and, as far as possible, the confidentiality of the whistle-blower will be maintained. A whistle-blower's identity may, however, have to be disclosed to conduct a thorough investigation and to comply with the law. Protection from retaliation includes, but is not limited to, protection against adverse employment action such as termination, compensation decreases, poor work assignments and threats of physical harm. Any whistle-blower who believes they is being retaliated against must promptly report this concern to any of the parties listed above. The right of a whistle-blower for protection against retaliation does not include immunity for any wrongdoing they are found to have committed. All reports of improper, illegal, and dishonest activities will be promptly submitted to the Executive Director, if the Executive Director is not involved, and designated members of the Board of Directors who are responsible for investigating and coordinating corrective action.

Individuals filing a complaint concerning a violation or suspected violation of the ethical and legal standards noted above must act in good faith and have reasonable grounds for believing the information disclosed may indicate a violation of such standards. Any allegations that are made maliciously or knowingly to be false will subject to disciplinary action, up to and including termination.

The employee will be notified that the reported violation or suspected violation has been received. All reports will be promptly investigated, and appropriate action will be taken based on the results of the investigation.