

Whistleblower Policy

Purpose

Girl Scouts of Greater Chicago and Northwest Indiana (GSGCNWI) requires all directors, officers, employees, volunteers and contracted vendors (hereafter referred to as “stakeholders”) to observe high standards of professional and personal ethics in the conduct of their duties and responsibilities. These individuals must comply with all applicable laws and regulations, and practice the Girl Scout Law and Promise in fulfilling their responsibilities.

This policy establishes procedures for the reporting of:

- concerns regarding accounting or auditing activities;
- the commission of unlawful acts such as corruption, bribery, theft or misuse of council property, fraud, coercion, willful omission to perform duty;
- gross misconduct or gross inefficiency;
- any condition that may significantly threaten the health or safety of girl members, volunteers, employees or the public.

Reporting in Good Faith

GSGCNWI encourages all stakeholders to promptly report any action or suspected action in violation of our ethical standards using the procedures established by this policy. Stakeholders reporting a known or suspected violation must do so in good faith, without malice to GSGCNWI or any individual, and have reasonable grounds for believing that a violation of our standards has occurred. Failure to report a suspected violation or to act in good faith may result in corrective action up to and including termination of services provided by the stakeholder.

No Retaliation

This Whistleblower Policy is intended to encourage and enable stakeholders to raise concerns within GSGCNWI prior to seeking resolution outside the organization. With this goal in mind, no stakeholder who in good faith reports a suspected violation, or cooperates in the investigation of a suspected violation, will suffer harassment, retaliation, or be subject to adverse employment, volunteer or vendor consequences as a result of their efforts to comply with this policy. Moreover, retaliation against a stakeholder who has reported a suspected violation in good faith is grounds for corrective action up to and including termination of services provided by the stakeholder.

Reporting Procedures

Serious concerns relating to financial reporting, unethical or illegal conduct, should be reported via any one of the avenues listed below. The variety of options provided are intended to offer flexibility for the complainant and the ability to report to parties not implicated in the complaint.

Employees

- Discuss the concern with your immediate supervisor, manager, or department head
- Discuss the concern with a member of the Human Resources team

Directors

- Discuss the concern with the Board Chair
- Discuss the Concern with the CEO or a member of the executive team

Volunteers

- Discuss the concern with your volunteer supervisor/SUVA manager
- Discuss the concern with your primary staff liaison

Vendors

- Discuss the concern with your primary contact within GSGCNWI

OR

All employees, directors, volunteers, and vendors (who require anonymity) may make use of our third party reporting service via any the following avenues:

- Toll Free Telephone Hotline: 877-472-2110 (English speaking U.S. and Canada)
800-216-1288 (Spanish speaking North America)
- E-mail: reports@lighthouse-services.com (complainant must identify name of the company)
- Fax alternative for written documents: 215-689-3885 (please be sure to use company name)
 - Web: lighthouse-services.com (click on Submit Report button).
Username: GSGCNWI and Password: juliette

Complaint Handling Procedures

The action taken will depend on the nature of the concern. Initial inquiries will be made to determine whether an investigation is appropriate, and the form that it should take. Some concerns may be resolved by agreed action without the need for investigation.

Regardless of whether the concern was reported to GSGCNWI staff or through the third party service, the complainant will be given the opportunity to receive follow-up on their concern:

- Acknowledgment that the concern was received
- General indication of how the matter will be dealt with
- Giving an estimate of the time that it will take for resolution

The final disposition of all complaints received will be reported and reviewed by the Audit Committee of the Board of Directors.

Confidentiality

Reports of suspected violations, and investigations pertaining thereto, will be kept confidential to the extent possible, consistent with the need to conduct a full investigation and cooperate with law enforcement authorities. Disclosure of such information to individuals not involved in the investigation will be viewed as a serious disciplinary offense and may result in corrective action up to and including termination of services provided by the stakeholder.

GSGCNWI strongly encourages stakeholders to identify themselves when reporting suspected violations in order to facilitate investigation of the matter. However, reports may be made anonymously in writing or by voice message to the VP of HR or through the third party reporting service. Please note that while anonymous allegations will be investigated to the extent

possible, consideration will be given to the prudence of continuing such investigations based on the likelihood of confirming the alleged facts or circumstances.

THE GIRL SCOUT PROMISE

On my honor, I will try:

To serve God* and my country,
To help people at all times,
And to live by the Girl Scout Law.

THE GIRL SCOUT LAW

I will do my best to be

honest and fair
friendly and helpful,
considerate and caring,
courageous and strong, and
responsible for what I say and do,

and to
respect myself and others,
respect authority,
use resources wisely,
make the world a better place, and
be a sister to every Girl Scout.