Whistleblowers

GPL requires and encourages directors, officers and employees to observe and practice high standards of business and personal ethics in the conduct of their duties and responsibilities. The employees and representatives of the non-profit must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations. It is the intent of GPL to adhere to all laws and regulations that apply to the non-profit and the underlying purpose of this policy is to support the non-profit's goal of legal compliance. The support of all staff is necessary to achieving compliance with various laws and regulations.

If any director, officer, or employee reasonably believes that some policy, practice, or activity of GPL is in violation of law, a written complaint must be filed by that person with the Chairperson. The Chairperson presents it to the Governance Committee.

Anyone filing a complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false shall be viewed as a serious disciplinary offense.

Said person is protected from retaliation only if she/he brings the alleged unlawful activity, policy, or practice to the attention of GPL and provides GPL with a reasonable opportunity to investigate and correct the alleged
unlawful activity. The protection described below is only available to individuals that comply with this requirement. GPL shall not retaliate against any director, officer, or employee who in good faith, has made a protest or raised a complaint against some practice of GPL or of another individual or entity with whom GPL has a business relationship, on the basis of a reasonable belief that the practice is in violation of law, or a clear mandate of public policy.

GPL shall not retaliate against any director, officer, or employee who discloses or threatens to disclose to a supervisor or a public body, any activity, policy, or practice of GPL that the individual reasonably believes is in violation of a law, or a rule, or regulation mandated pursuant to law or is in violation of a clear mandate of public policy concerning the health, safety, welfare, or protection of the environment.

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations shall be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

The Chairperson shall notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. The Board will be

promptly notified of any allegations and will be responsible for final approval of any recommendations presented by the Governance Committee. Staff or employees shall have the opportunity to ask questions about the policy.