

CERP

Whistleblower Policy

Whistleblower Protection

In a continued commitment to ethics, CERP encourages all affiliated individuals (including employees, consultants, contractors, Board members, external partners) to report suspected or actual occurrence(s) of illegal, unethical or inappropriate events (including both behaviors or practices) without retribution.

Whistleblower

A whistleblower as defined is an individual who reports an activity that he/she considers to be illegal, unethical, or inappropriate. The whistleblower is not responsible for investigating the activity or for determining fault or corrective measures; appropriate management officials are charged with these responsibilities.

Protections

Whistleblower protections are provided in two important areas:

- 1. Confidentiality:** Whistleblowers may report events with his/her identity known or anonymously. Insofar as possible, the identity of the Whistleblower, if known, shall remain confidential to those persons directly involved in applying this policy. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law, and to provide accused individuals their legal rights of defense.
- 2. Protection from retaliation:** CERP will not retaliate against a whistleblower who reports an event in good faith. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, or poor work assignments and threats of physical harm. Anyone who retaliates against the whistleblower will be subject to discipline, including termination of employment or vendor status. Any whistleblower who believes he/she is being retaliated against must contact the Senior Manager of Human Resources immediately.

The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

Responsibilities

Individuals must exercise sound judgment to avoid baseless allegations. Any person who intentionally files a false report of wrongdoing will be subject to discipline up to and including termination.