

Whistleblower Policy: Reporting Suspected Violations of Law and Policy

Approved 7/9/08

The Great Falls Development Authority (GFDA) is committed to maintaining a workplace where employees are free to raise good faith concerns regarding GFDA's business practices, specifically: **(1)** reporting suspected violations of law on the part of GFDA, including but not limited to federal laws and regulations; **(2)** providing truthful information in connection with an inquiry or investigation by a court, agency, law enforcement, or other governmental body; and **(3)** identifying potential violations of GFDA policy.

An employee who wishes to report a suspected violation of law or GFDA policy may do so confidentially by contacting the President or Senior Vice President. If the suspected violation involves the President, the employee should report to the Chair or Vice Chair of the Board.

GFDA expressly prohibits any form of retaliation, including harassment, intimidation, adverse employment actions, or any other form of retaliation, against employees who raise suspected violations of law, cooperate in inquiries or investigations, or identify potential violations of GFDA policies. Any employee who engages in retaliation will be subject to discipline, up to and including termination.

Any employee who believes that he or she has been subjected to any form of retaliation as a result of reporting a suspected violation of law or policy should immediately report the retaliation to the President. If the President is involved in the suspected retaliation, the employee should report to the Chair or Vice Chair of the Board.

Reports of suspected violations of law or policy and reports of retaliation will be investigated promptly and in a manner intended to protect confidentiality, consistent with a full and fair investigation. The investigating parties will notify the concerned individuals of their findings directly, or indirectly through the outside company managing the hotline where appropriate, and prepare other reports as indicated by the circumstances. A summary of all such reports will be presented to the Executive Committee of the Board of Directors.

This policy has been adapted from one used by The Nature Conservancy.