

SCOPE:

This policy applies to all Girl Scouts of NYPENN Pathways, Inc. employees, appointed volunteers, and elected volunteers, including part time and temporary employees.

PURPOSE:

Girl Scouts of NYPENN Pathways, Inc. is committed to the highest possible standards of ethical, moral and legal business conduct. In line with this commitment and Girl Scouts of NYPENN Pathways, Inc.'s commitment to open communication, this policy aims to provide an avenue for employees to raise concerns and reassurance that they will be protected from reprisals or victimization for whistleblowing in good faith. If an employee feels that their anonymity is not required then they should follow our existing grievance procedure.

POLICY:

The whistleblowing policy is intended to cover serious concerns that could have a large impact on Girl Scouts of NYPENN Pathways, Inc., such as actions that:

- May lead to incorrect financial reporting;
- Are unlawful;
- Are not in line with company policy, including the Code of Business Conduct; or
- Otherwise amount to serious improper conduct.

Regular business matters that do not require anonymity should be directed to the employee's supervisor and are not addressed by this policy.

SAFEGUARDS:

Harassment or Victimization:

Harassment or victimization of the complainant will not be tolerated.

Confidentiality:

Every effort will be made to protect the complainant's identity. Please note that the information provided by you may be the basis of an internal and/or external investigation into the issue you are reporting and your anonymity will be protected to the extent possible. However, your identity may become known during the course of the investigation.

Anonymous Allegations:

The policy allows employees to remain anonymous at their option. Concerns expressed anonymously will be investigated, but consideration will be given to:

- The seriousness of the issue raised;
- The credibility of the concern; and
- The likelihood of confirming the allegation from attributable sources.

Malicious Allegations:

Malicious allegations may result in disciplinary action.

PROCEDURE:

Reporting:

The whistleblowing procedure is intended to be used for serious and sensitive issues.

Serious concerns relating to financial reporting, unethical or illegal conduct should be reported in either of the following ways:

- Through the Toll Free Hotline: 877-472-2110
- E-mail: reports@lighthouse-services.com (please include company name with your report)
- Fax alternative for written documents: 215-689-3885
- Web: lighthouse-services.com/gsnypenn

Callers to the Hotline will have the ability to remain anonymous if they choose. Please note that the information provided by you may be the basis of an internal and/or external investigation into the issue you are reporting and your anonymity will be protected to the extent possible by law. However, your identity may become known during the course of the investigation. Complaints are submitted by Lighthouse to Girl Scouts of NYPENN Pathways, Inc. or its designee, and may or may not be investigated at the sole discretion of Girl Scouts of NYPENN Pathways, Inc.

Employment-related concerns should continue to be reported through your normal channels such as your supervisor, department head, or to the Vice President of Human Resources (315-698-9400 x 2024).

Timing:

The earlier a concern is expressed, the easier it is to take action.

Evidence:

Although the employee is not expected to prove the truth of an allegation, the employee needs to demonstrate to the person contacted that there are sufficient grounds for concern.

HOW THE COMPLAINT WILL BE HANDLED:

The action taken will depend on the nature of the concern. The Audit Committee Chairperson of the Girl Scouts of NYPENN Pathways, Inc. Board of Directors receives a report on each complaint and a follow-up report on actions taken.

Initial Inquiries:

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.

Report to Complainant:

Whether reported to Girl Scouts of NYPENN Pathways, Inc. personnel or through the hotline, the complainant will be given the opportunity to receive follow-up on their concern:

- Acknowledging that the concern was received;
- Indicating how the matter will be dealt with;

Further Information:

The amount of contact between the complainant and the body investigating the concern will depend on the nature of the issue, the clarity of information provided, and whether the complainant remains accessible for follow-up. Further information may be sought from the complainant.

Information:

Girl Scouts of NYPENN Pathways, Inc. reserves the right to modify or amend this policy at any time as it may deem necessary.