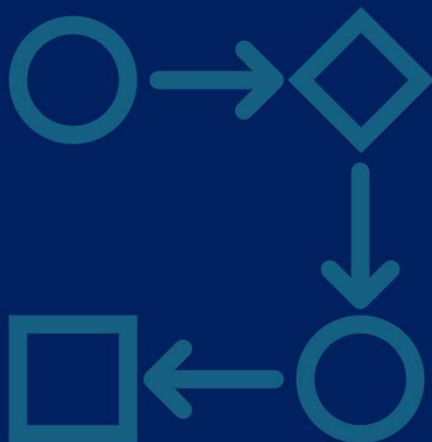

# Policy and Procedure

Topic: Confidential Reporting

# Confidential Reporting

| | |
|---|---|
| **Number:** | CCD.23551 |
| **Effective Date:** | June 30, 2005 |
| **Review Cycle:** | Annual (June 30) |
| **Line of Business:** | Enterprise |
| **Owner:** | Corporate Compliance Office |

## I. POLICY

### 1. Purpose

The Company is committed to maintaining an ethical, safe, and legally compliant workplace. This policy establishes a confidential process for reporting concerns related to misconduct, violations of the Acme Corporation Code of Conduct ("Code of Conduct"), violations of company policy, unethical behavior, or potential legal or regulatory issues.

### 2. Definitions

**Company** Acme Corporation, including its subsidiaries, divisions, and affiliates, and any entity under common control, as defined in its governing documents.

**Workforce** Any person engaged in performing work for the Company, whether as a full-time or part-time employee, independent contractor, or intern, and includes all individuals covered under applicable employment, contractor, or internship agreements, regardless of classification status.

## 3. Scope

This policy applies to the Company's Workforce and all third-party partners who interact with the Company.

## 4. Policy Statement

The Company encourages reporting concerns in good faith without fear of retaliation. The Company strictly prohibits retaliation against anyone who raises a concern, participates in an investigation, or assists in resolving a compliance matter.

Reports may be made anonymously where permitted by law.

## 5. Types of Concerns to Report

Concerns that should be reported include, but are not limited to:

- Violations of the Code of Conduct
- Harassment, discrimination, or workplace misconduct
- Conflicts of interest
- Fraud, theft, or misuse of company assets
- Safety or security concerns
- Violations of laws, regulations, or company policies
- Data privacy or confidentiality breaches

## 6. Reporting Channels

Individuals may report concerns through any of these channels:

- Your leader or senior leader
- A Human Resources Business Partner (HRBP)
- An Employee Relations Partner
- An attorney in the Legal Department
- The Corporate Compliance Office
- *ComplianceLine* (1-888-123-4567)

## 7. Investigation Process

1. **Acknowledgment**
   If contact information is available, the Corporate Compliance Office will acknowledge receipt of the report within three business days.
2. **Assessment**
   The Compliance Office may consult with other business partners to determine if the report falls within the scope of compliance concerns.
3. **Investigation**
   An investigator will conduct interviews, review documents, and gather evidence.
4. **Resolution**
   The Corporate Compliance Office will document findings, and any required corrective actions will be implemented.
5. **Closure**
   If contact information is available, the reporter will be informed of the outcome.

## 8. Confidentiality

All reports will be handled as confidentially as possible. Information will be shared only with individuals responsible for investigating or resolving the concern. Anonymous reports will be honored to the extent allowed by law and consistent with effective investigation practices.

## 9. Non-Retaliation

Any form of retaliation against individuals who report concerns in good faith is prohibited and may result in disciplinary action, up to and including termination of employment or contract.

## 10. Recordkeeping

All reports and investigation records will be securely retained in accordance with legal and regulatory requirements.

## 11. Training and Awareness

The Workforce will receive annual training on recognizing and reporting compliance concerns.

## 12. Policy Review

This policy will be reviewed and updated as necessary to reflect changes in laws, regulations, or organizational needs.

# II. PROCEDURE

## 1. Information to include when reporting a concern

Be prepared to provide as much information and detail as possible in your report. Information that will aid an investigation includes, but is not limited to:

- Description of the concern
- Date, time, and location of the incident(s)
- Names of individuals involved
- Any supporting evidence you have obtained

## 2. Making a report through an internal channel

There are several internal channels through which you may report concerns.

| Channel | Contact |
|---|---|
| **Your senior leader** | [link to upline] |
| **Your HR Business Partner** | [link to list] |
| **Employee Relations Partners** | [link to list] |
| **Legal Department Attorneys** | [link to list] |
| **Corporate Compliance Office** | x1212 \| 567.890.1212 |

## 3. Making a report to *ComplianceLine*

*ComplianceLine* is accessible 24 hours a day, seven days a week, 365 days a year. This service is provided by an external vendor. Caller ID information does not pass into the vendor's systems.

Unlike using internal channels, *ComplianceLine* allows you to provide identifying information or remain anonymous.

| Step | Action |
|---|---|
| **1** | Call *ComplianceLine* at 1-888-123-4567 |
| **2** | When prompted, select Option 1 - Make a report |
| **3** | Select your reporting option:<br>a) Option 1 - Anonymous<br>b) Option 2 - Name and contact<br>i. When prompted, provide your name and contact information |
| **4** | When prompted to record, describe your concern clearly. Provide as much detail as possible, including dates, individuals involved, and any supporting information that my assist the investigation. |
| **5** | When your report is complete, select # |
| **6** | You will receive a unique case number. You can use this number to follow-up on your report, even if you decided to remain anonymous. |
| **7** | Follow the prompts to complete the call.<br>a) Option 1 - Repeat the case number<br>b) Option 2 - End the call |

## 4. Following up on a report made to *ComplianceLine*

You can call *ComplianceLine* and use your case number to provide additional information or review updates.

<table>
<tr><th>Step</th><th>Action</th></tr>
<tr><td>1</td><td>Call ComplianceLine at 1-888-123-4567</td></tr>
<tr><td>2</td><td>When prompted, select Option 2 - Follow up on a past report</td></tr>
<tr><td>3</td><td>Select your follow-up option:<br>a) Option 1 - Hear status<br>i. When prompted, enter your case number, then press #<br>ii. After the status is read, choose 1 to repeat or 2 to return to the main menu<br>b) Option 2 - Provide additional information<br>i. When prompted to record, provide additional detail, then select #</td></tr>
<tr><td>4</td><td>Follow the prompts to complete the call.<br>a) Option 1 - Hear the menu options again<br>b) Option 2 - End the call</td></tr>
</table>

# III. RELATED DOCUMENTS AND POLICIES

| Number | Name |
|---|---|
| N/A | Code of Conduct |
| HR.86693 | Anti-Harassment & Anti-Discrimination Policy |
| LG.91754 | Whistleblower Protection Policy |
| FC.99848 | Workplace Safety & Security Policy |
| CCD.23551 | Compliance & Ethics Program Policy |
| IAI.23144 | Fraud, Waste & Abuse Policy |
| IT.09874 | Privacy & Data Protection Policy |
| IT.67432 | Acceptable Use of Company Assets |
| IT.49812 | Cybersecurity Policy |
| CCD.25846 | Conflict of Interest Policy |
| FC.99723 | Workplace Violence Prevention Policy |
| IAI.54034 | Internal Audit Policy |
| CCD.19802 | Records Retention Policy |

# IV. VERSION HISTORY AND CHANGE LOG

| Version | Date | Author | Description |
| --- | --- | --- | --- |
| | | | |
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| | | | |