

## **C2ES Whistleblower Policy**

C2ES is committed to a work environment in which all individuals are treated with respect and dignity. C2ES does not tolerate discrimination or harassment of any employee, including sexual harassment, nor does C2ES permit retaliation against any employee for reporting discrimination, harassment, or other unlawful or unethical conduct. C2ES expects that all relationships among persons in the office will be business-like and free of bias, prejudice, and harassment.

### **Section I – Types of Reporting**

1. Sexual Harassment
2. Discrimination in any form
3. Ethical/Legal Violations
4. Theft or fraud
5. Conflict of Interest
6. Retaliation

### **Section II – How to Report**

An employee who experiences, witnesses, or is aware of an incident mentioned is encouraged to report it immediately to any of the following:

1. Immediate supervisor
2. Human Resources Manager
3. Any other Senior member of C2ES management (VPs, Directors, CFO, President)
4. If for any reason an employee is uncomfortable reporting to any of the options above, they also have the option of reporting to the Chair of the Board Human Resources Committee, the Chair of the Board Audit Committee, or any other board member. See more information on the Board members document available to employees.

Incidents will be reported to the President in a timely manner. If the incident involves the President, Human Resources will report the incident to the Board Human Resources Committee.

Reported incidents of harassment, discrimination or retaliation will be investigated promptly. The investigation may include individual interviews with the parties involved as well as those individuals who may have witnessed the alleged behavior or have other relevant knowledge. C2ES will make an effort to maintain confidentiality throughout the process to the extent consistent with law, adequate investigation, and appropriate corrective action.

### **Section III – Retaliation**

C2ES does not permit retaliation against any employee for making a report of any type mentioned in Section I. This includes reports to C2ES staff and board, as well as law enforcement. Employees should raise questions and concerns and can and should make reports in good faith without fear of reprisal.

#### **Section IV – Corrective Action**

Anyone found to be engaging in any type of discrimination, harassment, retaliation, or other illegal or improper conduct will be subject to disciplinary action, potentially including termination of employment and/or legal action.