

## I. Commitment

Goodwill of the Great Plains is committed to conducting itself as a good organizational citizen with the utmost of professional integrity, ethics and honesty. This commitment extends to every aspect of our business. This includes and is not limited to every work-related activity of its employees, contractors, participants and individuals with responsibility pertaining to the ordering, provision, marketing, documentation, coding or billing of services reimbursable by Federal Contract Programs.

Goodwill of the Great Plains acknowledges the purpose of the compliance program is to prevent and detect any criminal, wasteful, fraudulent, unethical, abusive, improper conduct or other wrongdoings and take appropriate corrective action. Critical elements of a corporate compliance program may include: written resolution of corporate compliance responsibility by the governing authority; written designation of an individual to oversee the compliance program education and training; a no-reprisal system to monitor and evaluate compliance; and a system for responding to and correcting problems.

## II. Reporting and Response

Employees have the responsibility to report any wrongdoing through the Corporate Compliance Program. We strongly encourage the employee to inform their supervisor as the first option for reporting, unless the supervisor is directly involved in the misconduct. In addition, subpoenas, search warrants, investigations and other legal actions should be reported through the Corporate Compliance Program.

The Chief Administrative Officer will serve as the Corporate Compliance Officer (CCO) at Goodwill of the Great Plains. Contact information is Corporate Compliance Officer, 3100 W. 4th Street, Sioux City, Iowa 51103, with a phone number of 712.258.4511 extension 1381 locally or toll-free at 1.877.608.7775 extension 1381 for non-local callers.

Accountability Gateway. This service, furnished by Ethics Point, Inc. allows for website reporting as well as 24-hour, toll-free telephone reporting of such matters. If a report of corporate compliance violation is received at Goodwill's Accountability Gateway, the CCO will be notified via e-mail with directions regarding how to view the report. If the CCO is named in the allegation, the CEO will be notified of the report. If the CEO is also named in the allegation, the Director of Human Resources will be notified of the report.

Once a report is received, an investigation into the report's allegations will be undertaken within 72 hours. A swift and thorough investigation of the matter will be made, and if the findings reveal a violation, appropriate disciplinary action up to and including dismissal from employment will be taken.

### III. Training

The CCO shall see to the development of initial training for all employees. Employees are encouraged to ask questions throughout the orientation process to ensure that they understand the standards of the program.

Upon completion of orientation each employee shall complete, sign and forward to the Human Resources Coordinator a signed acknowledgement of training that will be placed in their personnel file.

### IV. Retribution

The organization shall not take corrective action against any employee for merely reporting what the employee reasonably believes to be a violation of this Program. However, the organization may take disciplinary action against an employee on several bases related to reporting. First, an employee who knowingly fabricated, distorted, exaggerated, or minimized a report of wrongdoing to either injure someone else or to protect himself/herself or others. Second, an employee whose report contains admissions of personal wrongdoing will not be guaranteed protection from corrective action. The organization generally will give positive weight to self-confession in determining corrective action; but the extent depends on factors such as whether the employee's conduct was previously known to the Organization, whether discovery of the conduct was imminent, and whether the confession was complete and truthful.

### V. Enforcement

The President, with recommendations from the Corporate Compliance Advisor, shall handle all corrective action for violations of the Program.

The President may consider the following circumstances: (a) the employee has promptly reported his or her own violation; (b) the employee's own report constituted the Corporate Compliance Advisor's first notice of the violation and the employee's involvement; and (c) the employee cooperates fully in investigation and correction of the violation.

Revised : November, 2008 – July 2008

Developed: January, 2007

Goodwill of the Great Plains  
3100 West Fourth Street  
Sioux City, Iowa 51103  
712-258-4511  
877-608-7775