



## Whistleblower Policy

Goodwill employees are expected and required to report any activity the employee suspects or considers to be illegal or dishonest (ex: violations of federal, state or local laws; violations of ethics; billing for services not performed or for goods not delivered; and other fraudulent financial reporting, etc.) to a supervisor, manager, the Director of Human Resources, the Chief Administrative Officer, or at Goodwill's Accountability Gateway (furnished by Ethics Point, Inc., which allows for anonymous website reporting or 24-hour, toll-free telephone reporting of such concerns). All employees are given business cards containing contact information for Goodwill's Accountability Gateway at the time of hire. Additionally, this information is posted in each of Goodwill's locations and a link to Goodwill's Accountability Gateway is maintained on our intranet (Company Web). Reports of such allegations will be forwarded to the Chief Administrative Officer or designee.

The employee, or "whistleblower", making the report will not be responsible for investigating the activity or for determining fault or corrective measures; appropriate management officials are charged with these responsibilities.

Whistleblower protections are provided in two important areas – confidentiality and retaliation. Insofar as possible, the confidentiality of the whistleblower will be maintained. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law and to provide accused individuals their legal rights of defense.

Goodwill will not retaliate against a whistleblower. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, or poor work assignments and threats of physical harm. If a whistleblower believes they are being retaliated against they must tell a supervisor, manager or the Chief Administrative Officer or designee immediately. A report may also be made anonymously through Goodwill's Accountability Gateway. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

All reports of illegal and dishonest activities will be promptly submitted by the supervisor or manager to the Chief Administrative Officer or designee, who is responsible for investigating and coordinating corrective action. Such reports may also be made anonymously to Goodwill's Accountability Gateway. In the event it is the Chief Administrative Officer's conduct which is in question, the report should be made by the supervisor or manager to the President/CEO. The investigation process will commence within 48 to 72 hours of allegation receipt and will be conducted swiftly and thoroughly. If allegations are founded, appropriate disciplinary action up to and including dismissal from employment will occur.

Employees with any questions regarding this policy should contact the Chief Administrative Officer or designee.

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