



# Whistleblower Policy

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# 1. Introduction

Crisis Prevention Institute, Inc., including all branches and subsidiaries (collectively “CPI”), takes great pride in the work we do. We also are proud of our efforts to treat our employees, our customers, and our business partners in a fair, ethical, and honest manner.

CPI has implemented this Whistleblower Policy to allow employees, customers, and business partners to make CPI aware of genuine concerns regarding CPI’s compliance with applicable laws, regulations, and CPI’s Code of Ethics and Business Conduct. Nothing in this policy prevents an employee, customer, or business partner from reporting their concerns to relevant government agencies or other third-parties. However, those procedures are outside the scope of this Policy.

CPI disseminates this Policy, and its Code of Ethics and Business Conduct, to all CPI employees. This Policy, and the Code, also are available to all employees on CPI’s intranet. CPI publishes this Policy, and its Code, on its public website.

The purpose of this Policy is to explain:

- CPI’s Whistleblower System;
- Who may use CPI’s Whistleblower System;
- When it is appropriate to use CPI’s Whistleblower System;
- Submitting a Whistleblower Report;
- Protections for those individuals involved in a Whistleblower Report;
- The investigation of Whistleblower Reports;
- Processing of personal data relating to Whistleblower Reports; and
- Penalties for Violating this Policy.

## 2. CPI’s Whistleblower System

CPI’s Whistleblower System allows employees and business partners to make a report to CPI of their reasonable and genuine belief of an actual or potential violation of CPI’s Code of Ethics and Business Conduct or of an applicable law or regulation.

CPI employees may make a Whistleblower Report using CPI’s dedicated whistleblower email address: [whistleblower@crisisprevention.com](mailto:whistleblower@crisisprevention.com), CPI’s Open Door Policy, or CPI’s toll free international Confidential Line: +1 866 972 9413.

Former CPI employees, CPI customers, and CPI’s business partners, may file a Whistleblower Report using CPI’s dedicated whistleblower email address: [whistleblower@crisisprevention.com](mailto:whistleblower@crisisprevention.com).

## 3. Who May Use CPI’s Whistleblower System?

The following individuals are eligible to use CPI’s Whistleblower System to file a Whistleblower Report:

- Current employees of CPI, including employees of any CPI branch or subsidiary;

- Former employees of CPI if the facts relating to their Whistleblower Report either occurred or were obtained during their employment;
- Candidates for employment with CPI if the facts relating to their Whistleblower Report were obtained as part of their application for employment with CPI;
- Shareholders, Partners, and Option Holders of CPI;
- Members of CPI's senior leadership or executive leadership teams;
- Members of CPI's Board of Directors or any individual holding a position through which they can exercise managerial authority over CPI;
- Temporary employees, consultants, and the employees of consultants who are providing services to CPI;
- Volunteers;
- Third-party contractors, sub-contractors, suppliers, or agency workers, both current or former, who performed work for or provided services to CPI;
- Potential service providers to CPI who obtained the information relating to their concern during pre-contract negotiations or disclosures; and
- Business Partners of CPI, including the employees of Business Partners involved in providing services to CPI.

## 4. When is it Appropriate to Use CPI's Whistleblower System?

Eligible individuals may use CPI's Whistleblower System to report acts by CPI, or by its employees acting in their official capacity, when those acts could constitute:

- A violation of criminal law or a miscarriage of justice;
- A violation of a law or regulation governing the operation of CPI's business;
- (For EU employees or operations) A breach of EU law as defined in section 3 of the Protected Disclosures Act 2014 (as amended), including those listed in Schedule 6 of the Act<sup>1</sup>;
- A threat to the health or safety of an individual or the environment;
- The destruction or concealment of information relating to a reportable concern; or

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<sup>1</sup> Section 3 refers to EU laws relating to public procurement, financial services, products and markets, financial crimes, money laundering, product safety and compliance, transport safety, environmental protections, radiation and nuclear safety, food and feed safety, animal health and welfare, public health, consumer protection, and data protection/privacy. Schedule 6 elaborates on these categories.

- A breach of CPI's Code of Ethics and Business Conduct which regulates:
  - Honest and ethical conduct by CPI and its employees;
  - Corporate opportunities;
  - Conflicts of interest;
  - Gifts and entertainment;
  - Bribery and corruption;
  - The proper use of company assets; and
  - Financial statements.

A Whistleblower Report can relate to any aspect of CPI's business. However, such Reports are particularly appropriate in areas relating to:

- Accounting, banking, and finance;
- Anti-competitive practices;
- Corruption, ethics, and bribery; and
- Corporate governance.

Generally, this Policy should not be used for complaints which relate solely to interpersonal grievances affecting a single individual. Under these circumstances, employees are encouraged to use CPI's Open Door or Confidential Line policies, or the other available complaint procedures described in their employee handbook.

If an employee is uncertain whether something is within the scope of this Policy, they should seek advice from CPI's Human Resources Department, a member of CPI's Executive Leadership Team, or CPI's Legal Team.

## **5. Submitting a Whistleblower Report**

### **5.1 Procedures available only to CPI employees**

As noted above, a wide range of people may use CPI's Whistleblower System to submit a Whistleblower Report. In addition to this System, CPI has implemented alternate channels which are available only to CPI employees.

CPI has an Open Door Policy which encourages employees to bring concerns regarding their workplace or work environment to their direct manager. When appropriate, an employee's direct manager can help them complete a Whistleblower Report. The manager also may be able to help resolve the employee's concerns. As part of the Open Door policy, employees also may bring their concerns directly to any member of CPI's Human Resources Department or to any member of CPI's Executive Leadership Team.

If an employee uses CPI's Open Door Policy to bring a workplace or work environment concern to their manager, CPI's Human Resources Department, or CPI's Executive Leadership Team, the individual receiving the report should make sure a Whistleblower Report is filed if such a report is appropriate. That individual also should advise the employee about the protections available to anyone involved in a Whistleblower Report

CPI has an international Confidential Line which any employee may use to submit an oral Whistleblower Report. That phone number is +1 866 972 9413. Only CPI's Legal Department has access to this number or to messages left on it.

The existence of CPI's Open Door Policy and its Confidential Line does not prevent employees from choosing to use CPI's Whistleblower System, or from raising concerns directly with the appropriate judicial or governmental authorities. The Open Door Policy and Confidential Line are simply alternate means current CPI employees may use to raise concerns or submit a Whistleblower Report.

## **5.2 The process of submitting a Whistleblower Report using CPI's Whistleblower System**

When a person eligible to submit a Whistleblower Report chooses to use CPI's Whistleblower System, they should submit that report to CPI's dedicated email address: [whistleblower@crisisprevention.com](mailto:whistleblower@crisisprevention.com).

There is no standard form or template for a Whistleblower Report. However, the following guidelines apply to the submission of any Whistleblower Report:

- The report should be submitted by an individual, not a company or other legal entity.
- The report should be based on the Whistleblower's genuine belief that there has been or will be a violation of applicable laws, regulations, or CPI's Code of Ethics and Business Conduct.
- The report cannot be submitted in exchange for direct financial compensation.
- The information communicated must be factual, relevant, and directly related to the subject of the report.
- The information communicated must not fall within the scope of national defense secrecy, medical secrecy, the secrecy of judicial deliberations, the secrecy of judicial inquiries or investigations, or the attorney-client privilege.
- If the report does not relate to the Whistleblower's professional activities, the must have personal knowledge of the facts or events relating to their report.
- The report should specifically and objectively state the facts and other information supporting it.
- The report should include any documents which support or relate to it.

- The Whistleblower should provide a non-work email and/or phone number which can be used to communicate with them about the report. The Whistleblower may use a pseudonym if they wish to remain anonymous.

Any manager, member of human resources, or executive who receives a Whistleblower Report shall maintain the confidentiality of the Whistleblower.

While we encourage eligible individuals to bring concerns to CPI directly so that we may investigate and resolve them, some laws recognize that, in some circumstances, it may be appropriate for a whistleblower to report their concerns to an external body such as a regulator.

In the UK, the independent whistleblowing charity, “Protect,” operates a confidential helpline. Their contact number is 020 3117 2520, or UK employees can use the webform on their website: <https://protect-advice.org.uk/>.

## 6. Protections for those involved in a Whistleblower Report

### 6.1 Who is “involved” in a Whistleblower Report?

The people “involved” in a Whistleblower Report are:

- The Whistleblower;
- Anyone who receives the report or helps the person file a Whistleblower Report;
- The subject of the report; and
- Anyone interviewed during the course of investigating the Whistleblower Report.

### 6.2 Confidentiality

CPI’s Whistleblower System aims to protect the integrity and confidentiality of the Whistleblower Report, the identity of the Whistleblower, and CPI’s investigation. CPI also will protect the identity of witnesses unless they have given permission to disclose their identity.

The following information will remain strictly confidential:

- The identity of the Whistleblower;
- The identity of any other CPI employee or third party mentioned in the Whistleblower Report; and
- Information in the Whistleblower Report which could reveal the identity of the people listed above.

Eligible individuals may make anonymous reports. CPI will make every effort to investigate anonymous reports. However, investigations may be more difficult, if not impossible, when CPI cannot obtain further information from the Whistleblower.

Information identifying the Whistleblower may only be disclosed with the Whistleblower's consent. It may, however, be communicated to the judicial authorities, if the person responsible for collecting or processing the Whistleblower's Report is required to report information to those authorities. In that case, the Whistleblower will be informed, unless this information could compromise the legal proceedings.

Information that could identify the person who is the subject of a report may only be disclosed, except to judicial authorities, once it has been established that the report is well-founded.

If the Whistleblower wishes to file a Whistleblower Report anonymously, CPI undertakes not to attempt to re-identify them at any stage of the procedure, unless they have given their permission to disclose their identity.

### **6.3 Protections for the subject of the Whistleblower Report.**

Any person who is the subject of a Whistleblower Report has the right to confidentiality; the right to a fair and impartial investigation; the right to present evidence; and the right to a presumption of innocence.

The subject of a Whistleblower Report also has the right to be informed that they have been targeted by a Whistleblower Report and that their personal data will be processed in the course of the investigation of that Report.

If the Whistleblower chooses to file a report anonymously, CPI will not attempt to identify them at any stage of the investigation, unless and until the Whistleblower gives permission to disclose their identity.

### **6.4 Protections for witnesses**

The identity of witnesses will be protected unless they give permission for their identity to be disclosed.

CPI does not tolerate retaliation, of any kind, against anyone who participates in the investigation of a Whistleblower Report. Any witness who believes they have suffered retaliation because of their participation in such an investigation is encouraged to report that retaliation using CPI's Open Door Policy, its Confidential Line, or CPI's Whistleblower System.

If CPI determines an employee has retaliated against another employee for that employee's participation in a whistleblower investigation, the retaliating employee will be subject to appropriate discipline, up to and including immediate discharge.

### **6.5 Protections for the Whistleblower**

CPI aims to encourage openness and will support whistleblowers who raise genuine concerns under this Policy, even if they prove to be mistaken. CPI does not tolerate retaliation, of any kind, against anyone who raises genuine concerns under this Policy. Whistleblowers who raise certain types of concerns (known as "Protected Disclosures") have legal protection against retaliation. Regardless of whether an individual's report qualifies for this legal protection, if someone believes they have suffered retaliation because they filed a Whistleblower Report, they are encouraged to report that retaliation using CPI's Open Door Policy, its Confidential Line, or CPI's Whistleblower System.



If CPI determines an employee has retaliated against another employee because that employee filed a Whistleblower Report, the retaliating employee will be subject to appropriate discipline, up to and including immediate discharge.

Employees who file malicious or knowingly false reports may be subject to disciplinary sanctions. Employees filing reports in good faith cannot be subject to any disciplinary sanction, even if the facts prove to be inaccurate or if no further action is taken.

## **7. The Investigation of a Whistleblower Report**

After submitting a Whistleblower Report, the Whistleblower will receive an acknowledgement of its receipt within 7 working days, provided they have included a means by which CPI may communicate with them.

CPI's General Counsel will review and consider all Whistleblower Reports. When warranted, CPI may undertake an internal investigation, retain a third-party to conduct an investigation, or refer the Report to the appropriate governmental agency. If possible, CPI will advise the Whistleblower of how it intends to proceed. CPI also will advise the Whistleblower of how they may submit additional information relevant to the investigation, the obligation to avoid the destruction of relevant evidence, their rights, and the obligation to maintain confidentiality.

If CPI investigates a Whistleblower Report, that investigation will be completed within three months unless that time period is impractical. During the investigation, CPI will interview the Whistleblower, unless impractical. That person also may submit additional information to CPI's General Counsel either by email, by other writing, or orally.

The subject of any Whistleblower Report will be informed of that report no later than 30 days after CPI acknowledges receipt of the Report. CPI reserves the right to withhold this information from the subject of the report if CPI reasonably believes that disclosure will compromise the investigation. In that case, CPI will notify the target of the report as soon as this risk has been eliminated.

CPI will not disclose, to the subject of a report, the identity of the Whistleblower, the identity of anyone else targeted by the report, or the identity of any witness. CPI will inform the subject of the nature of the allegations, whether it has undertaken an investigation, how the subject may submit information relevant to the investigation, the obligation to avoid any destruction of relevant evidence, the rights of the subject, the obligation to maintain confidentiality, and the prohibition on retaliation.

The subject of any Whistleblower Report will be informed if his or her personal data will be or is expected to be processed as part of the investigation.

During the course of any investigation, CPI may interview any witness identified as someone who may have relevant information. During these interviews, CPI will maintain the confidentiality of the Whistleblower. CPI will advise all witnesses of their obligation to maintain the confidentiality of the investigation, their rights, and of CPI's obligation to maintain their confidentiality.

CPI will aim to keep the whistleblower informed of the progress of the investigation. However, sometimes the need for confidentiality may prevent CPI from providing specific details.

## 8. Processing of Personal Data

For purposes of this section, and the Data Privacy Appendix, the terms Personal Data, Processing, Data Subjects, Controller, Processor, and Recipient shall be interpreted in accordance with the definition given to them by applicable data protection laws and regulations which include, but are not limited to, the European Data Protection Regulation 2016/679 of April 27, 2016 (“GDPR”).

Submitting a Whistleblower Report through the Whistleblower System, the Open Door Policy, or any other means involves the implementation of a Processing by CPI as a Controller in compliance with applicable data privacy laws and the Data Privacy Appendix to this Policy. CPI will comply with its obligation of transparency under any relevant data privacy law by informing Data Subjects about the characteristics of the Processing implemented and the rights they have in this respect.

## 9. Penalties for Violating This Policy

The following actions violate CPI’s Whistleblower Policy:

- Knowingly presenting a false report or false information during the course of an investigation;
- Retaliating against any person involved in a Whistleblower Report;
- Failing to maintain the confidentiality of witnesses, a report, or an investigation;
- Discriminating against the Whistleblower, or against anyone involved in that report; and
- Discouraging any person from filing a Whistleblower Report.

In some jurisdictions, violations of this Policy may subject a person to civil and/or criminal penalties. In all cases, CPI will investigate any alleged violations of this Policy. If CPI determines an employee has violated this Policy, that employee will be subject to appropriate disciplinary sanctions up to and including immediate termination of their employment.

# Change History

Version	Change Description	Date	Author

# Data Privacy Appendix

The purpose of this Data Privacy Appendix is to describe the characteristics of the Processing of whistleblowing Personal Data when a Whistleblower Report has been filed and the rights that the Data Subjects have relating to such a report.

## 1) Characteristics of the Processing of whistleblowing Personal Data

Legal basis of the Processing	CPI's legitimate interests to treat its employees, customers, and business partners in a fair, ethical, and honest manner and to promote its compliance with applicable laws, regulations, and CPI's Code of Ethics and Business Conduct.
Purposes of the Processing	<ul style="list-style-type: none"> <li>• Receive and process Whistleblower Reports;</li> <li>• Investigate the Whistleblower Report and carry out the necessary checks and analyses;</li> <li>• Define the action(s) to be taken on the Whistleblower Report;</li> <li>• Protect the parties involved in a Whistleblower Report against the risk of reprisals;</li> <li>• Enable CPI to exercise, establish, and defend legal claims; and</li> <li>• Conduct internal or external audits of the Whistleblower System.</li> </ul>
Data subjects	<p>All persons involved in a Whistleblower Report:</p> <ul style="list-style-type: none"> <li>• The Whistleblower;</li> <li>• Anyone who receives the Report or helps the person file a Whistleblower Report;</li> <li>• The subject of the Report; and</li> <li>• Anyone interviewed during the course of investigating the Whistleblower Report.</li> </ul>
Personal Data processed	<p><u>Submission of the Whistleblower Report:</u> the Whistleblower has control over the data to be disclosed in the Whistleblower Report, subject to the Whistleblower's obligation not to disclose some Personal Data as set out in the Whistleblower Policy.</p> <p><u>Investigation of the Whistleblower Report:</u></p> <ul style="list-style-type: none"> <li>• Whistleblower Report (facts reported);</li> <li>• Identity, functions, and contact details of all persons involved in the Whistleblower Report;</li> <li>• Personal data gathered in the course of verifying the facts reported;</li> <li>• Reports on verification operations; and</li> <li>• Action taken on the Whistleblower Report.</li> </ul>

	<p>After CPI's decision on the action to be taken on the <u>Whistleblower Report</u>: as the case may be, all Personal Data necessary to (i) ensure the protection of all persons involved in the Whistleblower Report, (ii) exercise, establish and defend legal claims, and (iii) carry out internal or external audits of the Whistleblower System.</p>
Recipients	<ul style="list-style-type: none"> <li>• CPI employees specifically in charge of managing the Whistleblower Report;</li> <li>• Lawyer in charge of assisting CPI when receiving the Whistleblower Report; and</li> <li>• CPI's branches and subsidiaries when absolutely necessary to manage the Whistleblower Report.</li> </ul>
Data retention periods	<ul style="list-style-type: none"> <li>• Data kept in the active database until a final decision is reached on the action to be taken on the Whistleblower Report, which must take place within a reasonable period of time from receipt of the Whistleblower Report (2 months unless this deadline cannot be met);</li> <li>• Data kept in an intermediate database once a final decision has been reached on the action to be taken on the Whistleblower Report for a period of time proportionate to its processing, taking into account the time required for any further investigations;</li> <li>• Possibly longer retention periods if required by law, or for evidentiary purposes in case of control or litigation, or for the purposes of quality audits of the Whistleblower System;</li> <li>• Anonymized Data may be kept indefinitely as they do not permit the re-identification of the Data Subject.</li> </ul>
Security measures	<ul style="list-style-type: none"> <li>• Information and training of CPI employees handling data as part of a Whistleblower Report,</li> <li>• Definition of authentication and access management rules for CPI employees handling data as part of a Whistleblower Report;</li> <li>• Implementation of a traceability and incident management system;</li> <li>• Securing workstations and laptops of CPI employees handling data as part of a Whistleblower Report;</li> <li>• Securing the internal IT network, servers and websites used for the needs of Whistleblower Reports;</li> <li>• Implementation of data archiving procedures in compliance with the rules governing the definition of retention periods.</li> </ul>

## 2) Data Subject's rights related to the Processing of whistleblowing Personal Data

Data Subjects have the following rights to their Personal Data processed in connection with the operation of the Whistleblower System:

- **Right of access:** right to obtain confirmation from CPI that his/her Personal Data is being processed, to access such data and to request a copy;
- **Right of rectification:** right to request rectification of any inaccurate or outdated Personal Data whose material accuracy can be verified by CPI, as the exercise of this right must not make it possible to retroactively modify the content of a Whistleblower Report or the information collected during its investigation, and must not result in the impossibility of reconstructing the chronology of the facts or the modification of important elements of the investigation;
- **Right to object:** right to object to the Processing of his/her Personal Data on grounds relating to his or her particular situation, in which case CPI shall no longer process his/her Personal Data unless it proves compelling legitimate grounds for the Processing which override the Data Subject's interests, rights and freedoms or for the establishment, exercise, or defense of legal claims;
- **Right of erasure:** right to request erasure of Personal Data without undue delay if (i) Personal Data is no longer necessary in relation to the purposes of the Processing, (ii) the Data Subject has exercised his/her right to object and there are no overriding legitimate grounds for the Processing; or (iii) Personal Data must be erased for compliance with any legal obligation. In any case, CPI may refuse to comply with this request if it proves that the Processing is justified for the establishment, exercise, or defense of legal claims.

The request to exercise rights must come exclusively from the Data Subject, unless mandated in good and due form, and be addressed to CPI at the following e-mail address: [legal@crisisprevention.com](mailto:legal@crisisprevention.com).

CPI will answer the request to exercise rights within the time limits provided for by the GDPR or other applicable law. These time limits will range from one to three months depending on the level of complexity.

The Data Subject also benefits from the right to lodge a complaint with the competent supervisory authority according to his/her place of residence.