

WHISTLEBLOWER POLICY

Communications by Employees Regarding Concerns about CIP Compliance

1. OBJECTIVES

1.1 CIP has a duty of care to its stakeholders to use its resources efficiently, effectively and in accordance with its contractual obligations; to obey applicable local laws, rules and regulations as well as international treaties, conventions and other agreements; to conduct its activities in ways that meet high ethical standards as well as environmental, health and safety standards; to ensure the intellectual integrity of its research products; and to be accurate in reporting its financial, administrative, operational and other activities.

1.2 CIP's internal controls and operating procedures are intended to detect and to prevent or deter improper activities. This policy has been established for effective implementation of CIP's responsibility to investigate and take appropriate action of improper activities, including intentional and unintentional violations of laws, rules, regulations, policies and procedures.

1.3 In respecting the employees' expression of duty to protect and serve CIP, CIP senior leadership will support employees who communicate information about violations of laws, rules, regulations, and policies within CIP, and will encourage employees to report their concerns through the established channels of communication listed in this policy.

1.4 CIP senior leadership will consider any accused employee(s) innocent, absent an admission or positive determination of misconduct upon completion of an investigation by the Director General or Board of Trustees.

2. DESCRIPTION

2.1 Whistle blowing is the deliberate voluntary disclosure of any suspected or anticipated misconduct or violation of laws or policies within CIP. The employee who reports such activity is considered a whistleblower.

2.2 Regardless of their level, type of employment or location, CIP employees are encouraged to report improper activities, concerns or violations, may include but are not limited to the following:

- Illegal or unlawful conduct;
- Deliberate non-adherence to government laws, or CIP rules, regulations, policies, or procedures;
- Fraudulent financial reporting;
- Fraudulent billing for services not performed or not delivered;
- Fraudulent or unethical use of CIP's assets, resources, or research outputs;
- Deliberate covering up of violations.

3. IMPLEMENTATION

3.1 Report concerns – CIP implements a risk management system which seeks to minimize the risks of failure in these areas. CIP employees may report their concerns about actual or suspected breaches in duty of care when they feel these are not being adequately identified or addressed within the organization.

3.2 Channels of communication – Employees may report their concerns may include but are not limited to the following:

- Manager/Leader
- HR Head;
- Director General;
- Chair of the Board of Trustees
- Internal Auditors
- Or by sending a message to www.lighthouse-services.com/cipotato

3.3 Anonymity – In order to assist with investigations of the matter being raised, an employee may choose to remain anonymous. This decision will be respected by CIP management.

3.4 Follow-through – Recipients of whistle blower reports should provide the Director General or HR Global Head with a copy of the report except when the issue at hand justifies that the case should be heard at a higher level.

3.5 The DG or HR Global Head will then:

- determining whether to initiate an investigation,
- gathering information required for a thorough and fair investigation,
- advising the employees (whistleblower, recipient of report, subject(s) within report) of the final outcome of the investigation,
- taking appropriate action to correct failures,
- taking disciplinary action if necessary.

4. WHISTLEBLOWER PROTECTION

4.1 Whistleblower protection is essential to encourage the reporting of misconduct, fraud and corruption. CIP's commitment to provide effective protection for whistleblowers supports and open organizational culture where employees know how to report and have confidence in the internal procedures.

4.2 During the initial review, the HR Head may decide to recommend interim measures to protect the whistleblower from retaliation (in agreement with the whistleblower) could include determined on a case-by-case basis:

- a) Coordination with the individual's manager to ensure monitoring of the individual's workplace situation
- b) Temporary reassignment, transfer or change in duties
- c) Placement on administrative leave with pay
- d) Any other action which may include security measures,

4.3 Breaches in regard to confidentiality will be treated as serious violations and will be subject to CIP's disciplinary provisions.

4.4 Under certain circumstances, and with prior notice to the reporting employee, CIP may be required to share the identity of the employee making the report with outside law enforcement or judicial authorities.

4.5 The identity of CIP board members, managers or staff, or other persons external to CIP, who are the subject of reports submitted under this policy shall, at all times be treated as confidential by those making the reports and by those receiving and investigating the reports.

5. BREACHES AND DISCIPLINARY ACTION

5.1 Breaches in confidentiality shall be treated as serious violations subject to disciplinary provisions stipulated by the Director General or HR Head.

5.2 The use of confidential channels of communication to make reports in bad faith, i.e. without any basis or for the deliberate purpose of victimizing someone or disrupting the operations of the Center, will not be tolerated. Breaches in this regard will be treated as serious violations subject to disciplinary provisions stipulated by the Director General or HR Global Head.

6. REVIEWS & PREVENTIVE ACTION

6.1 The DG together with The Board of Trustees shall oversee the operation of this policy, including preparation and review of summary reports that should include:

- the number of reports made under the policy,
- types of concerns and complaints made,
- status of investigations of the reports,
- results of investigations completed, and
- corrective, punitive, and preventive actions taken.

6.2 CIP HR shall conduct orientation and awareness raising activities to support the implementation of this policy.

DATE

Approved December 2013

Updated November 2014

Updated November 2018

Updated August 2019