



## WHISTLEBLOWER POLICY

### I. PURPOSE

Greenpeace, Inc. and Greenpeace Fund, Inc. (hereinafter collectively as “Greenpeace”) are committed to the highest possible standards of ethical, moral and legal business conduct. In keeping with this commitment and Greenpeace’s interest in promoting open communication, this policy aims to provide a means through which employees could raise concerns with the reassurance that they will be protected from reprisals or victimization for whistleblowing in good faith.

### II. SCOPE

This policy applies to all Greenpeace employees, including part-time, temporary and contract employees.

### III. POLICY

The Whistleblowing Policy is intended to cover serious concerns that could have a large impact on Greenpeace, including actions that:

- A. May lead to incorrect financial reporting;
- B. Are unlawful;
- C. Are not in line with company policy; or
- D. Otherwise amount to serious improper conduct.

### IV. SAFEGUARDS

- A. Harassment or Victimization. Harassment or victimization of the complainant will not be tolerated.
- B. Confidentiality. Every effort will be made to protect the complainant’s identity.
- C. Anonymous Allegations. The policy encourages employees to put their names to allegations in order to facilitate appropriate follow-up questions and investigation. Concerns expressed anonymously will be investigated, but consideration will be given to:
  - (1) The seriousness of the issue raised;
  - (2) The credibility of the concern; and

(3) The likelihood of confirming the allegation from attributable sources.

D. Malicious Allegations. Malicious allegations may result in disciplinary action.

## V. PROCEDURE

A. Reporting. The whistleblowing procedure should only be used for reporting serious and sensitive issues. Serious concerns relating to financial reporting, unethical or illegal conduct should be reported by phone, e-mail or postal mail to the General Counsel.

Employment-related concerns should continue to be reported through normal channels, such as your supervisor, or Human Resources representative.

B. Timing. The earlier a concern is expressed, the easier it is to take action to address the issue raised. To ensure the factual accuracy of all complaints and take measures to mitigate or remedy them, all complaints should be made as soon as practicable.

C. Evidence. Although the employee is not expected to prove the truth of an allegation, the employee needs to demonstrate that he or she has a reasonable basis for the concern.

## VI. HANDLING OF COMPLAINTS

The action taken will depend on the nature of the concern. The Greenpeace Audit Committee should receive a report on each complaint and a follow-up report on actions taken to address it.

A. Initial Inquiries. Initial inquiries will be made to determine whether an investigation is appropriate, and the form that it should take. Some concerns may be resolved by agreed action without the need for investigation.

B. Report to Complainant. Whether reported to Greenpeace personnel or through the Whistleblower Alert Center, the complainant will be given the opportunity to receive a follow-up report on his or her complaint within two weeks after the complaint was initially made. The report shall:

- (1) acknowledge receipt of the complaint;
- (2) indicate how the matter will be dealt with;
- (3) give an estimate of the time it will take for a final response;
- (4) inform complainant whether initial inquiries have been made; and
- (5) inform complainant whether further investigations will follow; and, if not, the reasons for that decision.

C. Further Information. The amount of contact between the complainant and the body investigating the concern will depend on the nature of the issue and the clarity of

the information initially provided. Further information may be sought from the complainant in order to facilitate investigation and to ensure that all pertinent factors are considered in remedying the situation.

- D. Resolution. Subject to legal constraints, the complainant will receive information about the outcome of any investigations.

## **VII. VIOLATIONS**

Violations of this policy and these procedures may result in appropriate disciplinary action, up to and including dismissal.

## **VIII. RESPONSIBILITIES**

The General Counsel is responsible for implementing Greenpeace's policies and procedures (1) for reporting improper corporate action, and (2) for protecting employees against retaliatory actions. This includes ensuring that the policy and procedures set forth herein are:

- A. Permanently posted where all employees will have reasonable access to them;
- B. Made available to any employee upon request; and
- C. Provided to all newly-hired employees.

Officers, managers and supervisors are responsible for ensuring the procedures are fully implemented within their areas of responsibility.

## **IX. MODIFICATION & AMENDMENT**

Greenpeace reserves the right to modify or amend this policy as it may deem necessary.