



Whistleblower Policy & Procedures

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ELI IS COMMITTED TO FOLLOWING ALL RELEVANT LAWS AND THE HIGHEST STANDARD OF ETHICAL CONDUCT AND FINANCIAL STEWARDSHIP OF ITS ASSETS. ELI'S GRIEVANCE PROCEDURES BELOW ASSURE THE PROMPT AND FAIR RESOLUTION OF COMPLAINTS.

In implementing this policy, ELI shall provide for an annual audit of its financial statements and operating procedures by an independent, certified public accountant; promulgate and follow applicable codes of conduct; comply with relevant law and regulations applying to charitable, nonprofit corporations; and, to the extent reasonably applicable or required by law, conform to the legal rules governing public stock corporations.

To encourage public confidence that ELI will conform in practice to its announced policies and procedures and to legal compliance, ELI shall provide a clear process for individuals (including, but not limited to, members of the general public) or organizations to submit confidential complaints of questionable conduct by its employees or other covered individual, and maintain a process for investigating and resolving such complaints. ELI will not tolerate retaliation against any person who makes a good faith report of questionable conduct. Specifically, it is the express policy of ELI that no employee or contractor may be discharged, disciplined, or discriminated against in any way for making a good faith whistleblower report or for cooperating in the investigation of such a report. Additionally, violations of the whistleblower policy will result in disciplinary action, which may include suspension or termination of employment.

COVERED INDIVIDUALS & CONDUCT

Covered individuals include, but are not limited to, ELI's at-work employees, contract employees, officers and directors, interns, and volunteers. ELI will also encourage its contractors, vendors, grantees, consultants, and individuals participating in or affected by our programs to report any improper or questionable practices by ELI employees or other persons associated with ELI in positions of apparent trust, responsibility, or authority. For activities under our federal grants, our procedure fully complies with 40 CFR Parts 5 and 7.

Covered conduct includes, but is not limited to, the following examples:

- Harassment, discrimination, or inappropriate or offensive workplace behavior of any kind including against all protected classes (race, color, national origin, age, sex, and disability)
- Theft of cash, checks, or other financial instruments
- Misappropriation of accounts or other items of value
- Unauthorized destruction of financial, project, or personnel records
- Filing of fraudulent expense reports, over-billing, or authorizing over-billing by contractors, vendors, or consultants
- Making false or misleading statements to ELI managers or auditors
- Soliciting or receiving a bribe, unauthorized personal compensation, or a future benefit in exchange for providing ELI business
- Theft of ELI equipment or intentional damage to ELI equipment or other property
- Failing to report a personal conflict of interest that could potentially lead to ELI's financial harm.

REPORTING PROCEDURES

To the greatest extent possible and to the extent consistent with the needs of the investigation, the Institute will take steps to maintain as confidential the identity of the individual making a complaint. As indicated below, the Institute provides a number of methods by which a complainant can express concerns while maintaining complete anonymity.

ELI has engaged Syntrio/Lighthouse Services Inc., to provide a third-party whistleblower case management service. The staff of Lighthouse Services are required to take reasonable precautions to safeguard the anonymity of the reporting individual. **To initiate a complaint, the preferred method (for optimal user satisfaction) is to submit a report at www.lighthouse-services.com/eli.** Alternate methods include:

- **Toll-Free Telephone:**
 - English speaking USA and Canada: 833-401-0002
 - Spanish speaking USA and Canada: 800-216-1288
 - Spanish speaking Mexico: 01-800-681-5340
 - French speaking Canada: 855-725-0002
- **E-mail:** reports@lighthouse-services.com or **Fax:** (215) 689-3885
 - If using email/fax you must name ELI specifically in the report

If the report is made online, the complainant will complete a form designed to collect essential information regarding the complaint. If the report is made by telephone, the Contact Center Specialist will interview the reporting individual to gather as many essential details about the complaint as possible. Upon completion of the interview or online submission, the reporting individual making the complaint will be given a case number and pin number which will enable the reporting individual to check the status of the case and investigation through the Lighthouse web portal or by calling the Contact Center. When a complaint is received, Lighthouse will promptly inform ELI's management, or Board, as circumstances warrant. In no event, however, shall the firm notify any named official alleged to be involved in the conduct.

ELI will ensure that an appropriate investigation is promptly conducted. In the event that the reporting individual does not provide sufficient information to allow for an appropriate investigation, additional information may be required from the complainant via Lighthouse in order to proceed with the investigation.

Upon the completion of the investigation, the decision will be communicated back to the reporting individual through Lighthouse. ELI shall not be informed of the identity of the complainant at any point in this process, including at its conclusion unless the complainant opts to waive anonymity.

ZERO-TOLERANCE RETALIATION POLICY

ELI will not tolerate retaliation against any person who makes a good faith report of conduct that they reasonably believe may constitute covered conduct. It is ELI's express policy that no employee or other person may be discharged, disciplined, or in any way discriminated against for making a good faith whistleblower report or for cooperating in the investigation of such a report. Any report of such retaliation shall be considered a complaint of covered questionable conduct and shall be investigated promptly with the results of the investigation reported to the Chair of the Audit & Risk Management Committee and the Chair of the Board of Directors.