

The Complete Compliance and Ethics Manual 2023

Model Anti-Retaliation Policy

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Global Compliance	[Effective Date]	3

Scope: This policy applies to [Company], including its subsidiaries (collectively, “[Company Name]” or the “Company”), and the directors, officers, and employees of such entities, as well as all those acting for or on behalf of the Company (collectively, “Covered Individuals”).

Purpose: To protect all employees of the Company from any form of retaliation for speaking up about a potential compliance issue. This policy reinforces the Company’s commitment to ensuring a speak-up culture where all employees feel safe raising issues and concerns without fear of being retaliated against for doing so.

Any employee who, in good faith, reports a suspected violation, assists in the investigation of a potential issue, or requests information or clarification about the proper interpretation or application of any law, our Code of Conduct, or any Company policy or procedure should be able to do so freely and without worrying they will be retaliated against as a result.

What Is Retaliation?

For purposes of this policy, “retaliation” means any adverse action, or threat of adverse action, against an employee because they do, or are about to do, any of the following: file a complaint, raise a concern, provide information, or otherwise assist in an investigation or proceeding relating to any issue they reasonably and in good faith believe to be a potential violation of the Company’s Code of Conduct; any Company policy or procedure; or any applicable law, rule, or regulation.

Retaliation can take many different forms, but all forms are designed to “punish” or penalize a person for speaking up. Some types of retaliation are obvious. For example, an employee raises a concern, and because of this:

- Their employment is terminated.
- They are transferred to a less desirable shift, location, or job.
- Their job responsibilities are reduced (demotion).
- They are threatened or otherwise harassed.
- They are given a negative performance evaluation only as a result of reporting a concern in good faith.

Others forms of retaliation may be more subtle:

- Not being invited to business calls, meetings, and social gatherings;
- No longer having input into projects they were once involved in; or
- Being ignored or “iced out” by their coworkers.

No matter what form it takes, however, retaliation creates a hostile, threatening, and uncomfortable environment; negatively affects employment conditions for everyone; and is not consistent with our Company value of [INSERT SPECIFIC COMPANY VALUE].

Not all adverse actions are necessarily examples of retaliation. For example, it is not necessarily retaliation if an employee receives a negative performance review. If a negative review is the result of poor performance by the employee and unrelated to speaking up, this would not be an example of retaliation.

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