


Human Resources	Document No.	Revision Level:	 zippo [®] <small>MANUFACTURING COMPANY</small>
Description: WHISTLEBLOWER POLICY	Issuer:		
	Revised By:	Revision Date: 12/28/2017	


1.0 PURPOSE

- 1.1** It is the intent of the Company to abide by, if not exceed, all laws and regulations that apply to the Company. The purpose of this Policy is to maintain both legal compliance and the utmost ethical business practices by protecting employees who, in good faith, report potential illegal or dishonest fraudulent activities.
- 1.2** Examples of illegal or dishonest fraudulent activities are violations of Federal, State or local laws, billing for services not performed or for goods not delivered and other fraudulent financial reporting.
- 1.3** Please note that other Company policies address related matters including, but not limited to, the FCPA Anti-Corruption Policy, the Conflict of Interest Policy, the Anti-Discrimination and Anti-Harassment Policy, and the Electronic Information and Acceptable Use Policy.

2.0 SCOPE

2.1 Reporting

- 2.1.1** The Company has an open door policy and encourages employees to share questions, concerns or suggestions through a variety of avenues, including their immediate Supervisor. If employees are uncomfortable sharing information with a Supervisor or if they are unsatisfied with his/her response, they should contact another Supervisor or the Human Resources department. All members of Management are required to report complaints or concerns about suspected illegal conduct or violations of Company Policy to the Human Resources department. The Human Resources department will investigate thoroughly all complaints and act accordingly.
- 2.1.2** If an employee has knowledge of or a concern of illegal or dishonest fraudulent activity, the employee is to contact their immediate Supervisor or the Human Resources department. The employee must exercise sound judgment to avoid baseless allegations. An employee who intentionally files a false report of wrongdoing will be subject to discipline up to and including termination.

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2.1.3 Whistleblower protections are provided in two important areas -- confidentiality and retaliation. Where possible, the confidentiality of the whistleblower will be maintained by the Company, although confidentiality cannot be guaranteed. The Company will not retaliate against a whistleblower. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases or poor work assignments. Any employee who believes they are being retaliated against for reporting illegal or dishonest fraudulent activities must contact the Human Resources department immediately. The right of a whistleblower to protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

2.1.4 All reports of illegal and dishonest fraudulent activities will be promptly reviewed by Company management, who will investigate the matter and coordinate corrective action, as appropriate.

3.0 REFERENCES

- 3.1 Employee Handbook
- 3.2 FCPA Anti-Corruption Policy
- 3.3 Conflict of Interest Policy
- 3.4 Anti-Discrimination and Anti-Harassment Policy
- 3.5 Electronic Information and Acceptable Use Policy


4.0 APPROVAL AUTHORITY

WRITTEN / REVISED BY	APPROVED BY	APPROVAL (Initials/Signature)	DATE
	Bruce Gallagher		
	Bunny Comilla		

CONTROLLED DOCUMENT: DO NOT DUPLICATE! This document was printed on 12/19/2018.

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5.0 REVISION HISTORY

REV. #	REV. DATE	SCN No.	REVISED BY	CHANGES