**Whistle Blower Policy**

Last updated on July 15, 2019

Global Action is committed to the highest possible standards of ethical, moral, and legal conduct. Consistent with this commitment, Global Action endeavors to provide an avenue for employees to raise concerns about suspected misconduct, dishonesty, fraud, or unsafe working conditions, and to provide reassurance that they will be protected from reprisals or victimization for reporting (whistle-blowing) in good faith.

Any person with knowledge of an activity that he or she considers to be illegal, dishonest, or unsafe must report it immediately to a member of Global Action's Leadership Team.

If a member of the Leadership Team is not available, the employee must report the situation to his or her supervisor or to another member of management, who then must report to the Leadership Team.

If the report involves wrongdoing by the Leadership Team, the manager or employee must report it to a member of the Board of Directors.

No member of Global Action leadership may retaliate in any way against an employee who reports illegal, dishonest, or unsafe activity in good faith.

The Leadership Team, upon receiving a report, will initiate an investigation, when appropriate, and will take appropriate and prompt action.

The Whistle Blower Policy is also published in the Global Actions Operations Manual.