



Attachment 2: Whistleblower Policy

The Rights and Resources Group requires employees, directors, officers, sub-grantees, contractors, and vendors to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees, representatives, sub-grantees, contractors and/or vendors of the Rights and Resources Group, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

It is the responsibility of all directors, officers, sub-grantees, contractors, and vendors to report financial fraud, ethical/legal violations, or suspected violations immediately to RRG. Individuals may report issues to their supervisor, the RRG Executive Team (if employees of RRG), the Chief Operating Officer, the Compliance Officer or in the case of subgrantees or contractors, the primary point of contact in the contract. Individuals may also send information anonymously or with attribution via our website or the reporting mechanisms listed below.

Examples of illegal or dishonest activities include, but are not limited to: violations of national, federal, state or local laws; altering receipts to defraud the organization; accepting or soliciting bribes; billing for services not performed or for goods not delivered; and other fraudulent financial reporting.

Reporting Mechanisms

The Rights and Resources Group provides a multi-option and multi-language reporting tool for all with reporting responsibilities. The primary channel is a dedicated website, where reports may optionally be submitted anonymously.

Website: www.lighthouse-services.com/rightsandresources

Alternatively, affected individuals may use any of the following methods of reporting:

Anonymous Reporting App:

- Detailed instructions [here](#)
- Keyword: rightsandresources

Toll-Free Telephone:

- Direct Dial
 - English speaking USA and Canada: 855-222-0916
 - Spanish speaking USA and Canada: 800-216-1288
 - French speaking Canada: 855-725-0002
- AT&T USADirect
 - All other countries: 800-603-2869 (must dial country access code first [click here](#) for access codes and dialing instructions)

Email and Fax

- E-mail: reports@lighthouse-services.com (must include company name with report)
- Fax: (215) 689-3885 (must include company name with report)

Compliance Officer

The Rights and Resources Group's Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning violations per RRG internal policies and procedures. The Compliance Officer will provide the results and recommendations of any investigation to the President and/or the Executive Committee of the Board of Directors. The Compliance Officer has direct access to the Executive Committee of the Board of Directors and is required to report to RRG Executive Team and the Board Executive Committee at least annually on compliance activity that was elevated to the executive level of the organization.

Retaliation

The Rights and Resources Group will not tolerate any form of retaliation against any individual or employee for making a complaint in good faith or assisting in a complaint investigation. RRG employees who believe they are experiencing or witnessing retaliation in violation of this policy should make a report immediately to Human Resources or any other member of the Executive Team whom they feel comfortable approaching. Any RRG employee found to have retaliated against any other employee for making a complaint or assisting in an investigation will be subject to appropriate disciplinary action, up to and including termination.

Knowingly making false and malicious complaints of harassment or discrimination, as opposed to complaints that even if erroneous are made in good faith, may also lead to disciplinary action, up to and including termination.