

<b>COMPANY LOGO</b>	Policy Number: #	Date: <b>Date</b>
	Policy Name: <b>Non-Retaliation</b>	Rev: #
	Approver: <b>Name</b>	Function: <b>Name</b>

## OVERVIEW

This policy, which applies to all employees, is to confirm **Company's** commitment to non-retaliation and providing an environment that supports any individual who in good faith seeks advice, raises a concern, or reports perceived or observed misconduct.

### Key Terms

"in good faith" – making a genuine attempt to provide honest, complete, and accurate information, even if it later proves to be unsubstantiated or mistaken.

Retaliation – occurs when an employee takes adverse action against another employee for engaging in a legally-protected activity, such as complaining about discrimination or harassment internally or to an outside body such as the Equal Employment Opportunity Commission, or requesting a legal right such as a reasonable accommodation. Examples of adverse actions include, but are not limited to, demotion, discipline, termination, salary reduction, or reassignment and can also include forms of social or "soft" retaliation such as being ignored or treated differently, excluded, or harassed.

## POLICY

**Company** prohibits any retaliation against an employee who, in good faith, asks questions, reports possible violations of the Code, policy, or law, or participates in an official investigation.

Employees are to immediately report, using any of the avenues listed in the Code of Conduct, any witnessed or suspected retaliation. All reports of retaliation shall be thoroughly investigated and employees engaging in retaliation will be subject to disciplinary action, up to and including termination.

All supervisors and managers shall:

1. Maintain a work environment free of retaliation and respond immediately and appropriately to complaints or indications of such behavior,
2. Bring complaints to the attention of Human Resources, **Ethics Office**, and/or Legal, and
3. Administer disciplinary and other corrective action toward any individual determined to have violated this policy.

### Investigations

Complaints of retaliation will be promptly, fairly and thoroughly investigated and, where necessary, appropriate corrective action will be taken. Employees are required to cooperate fully with **Company's** investigations. To the extent possible, confidentiality will be maintained consistent with applicable practical, legal and ethical considerations. An employee shall not:

- Interfere with or obstruct an investigation,
- Conduct his or her own investigation,
- Destroy records, information or evidence reasonably known to be related to an investigation,
- Be knowingly untruthful or knowingly misrepresent or omit facts material to an investigation, or
- Retaliate against others because of their involvement in an investigation.

<b>COMPANY LOGO</b>	Policy Number: #	Date: <b>Date</b>
	Policy Name: <b>Non-Retaliation</b>	Rev: #
	Approver: <b>Name</b>	Function: <b>Name</b>

Employees who are found to have engaged in retaliation will be subject to disciplinary action, up to and including termination. In addition, members of management who fail to respond to complaints of retaliation or fail to act upon their knowledge of known or suspected violations of this policy will likewise be subject to disciplinary action, up to and including termination.

**Document Created:** May 2016

**Disclaimer:** This document is for reference only and to be used at the consumer's own risk. The Defense Industry Initiative (DII) does not guarantee the completeness or accuracy of this template policy. Although this template policy addresses common risks associated with being a government contractor, to ensure completeness, it is recommended that you supplement this template with provisions that affect your company's business. Depending upon your specific business, this template may not provide accurate or relevant provisions that apply to your company. Therefore, it is recommended that you adapt this template document as appropriate to align with your business requirements. This template has not been updated to reflect any changes or developments in the law that have occurred after the document creation date. As such, DII cannot guarantee that this document reflects current law.