

## **Whistleblower Policy (Revised May, 2015)**

PSI employees are expected to observe the highest standards of business and financial ethics and to comply with all applicable laws, regulations and PSI policies in the conduct of their duties. PSI urges employees to report any suspected financial or accounting impropriety or illegal or unethical business behavior without fear of retribution.

Should an employee become aware of, or be concerned about, financial or other activity which he or she believes in good faith to be illegal, dishonest, unethical, fraudulent<sup>1</sup>, or in violation of PSI policy, the employee must immediately report this to his/her immediate supervisor, director, or the Vice President of Talent and Learning and/or the Director of Global Internal Audit. Supervisors and directors should also promptly convey such reports to the Vice President of Talent and Learning and/or the Director of Global Internal Audit. For more information about internal PSI procedures for identifying and reporting fraud, employees should consult the Anti-Fraud Policy referenced in PSI's Accounting Policy Manual.

If an employee is uncomfortable reporting activity he/she believes to be improper through internal PSI channels, or is not satisfied with the response received, such activity may be reported on a confidential basis or submitted anonymously to EthicsPoint, the outside firm retained by PSI for this purpose, using the contact information below. EthicsPoint will be responsible for passing on reports they receive to PSI management or the PSI Board, so that the appropriate actions may be taken to resolve concerns raised.

### **Whistleblower Hotline Information**

EthicsPoint may be contacted through any of the following methods:

1. Toll free number: 888-238-1438
2. This direct link: <http://www.psi.ethicspoint.com>

In order to maintain the confidentiality of allegations and the fairness of the investigative process, employees should refrain from conducting any investigative activity on their own, such as contacting parties, requesting information from any source, or disclosing allegations to anyone other than those identified in this policy, absent specific instructions to do so.

No employee who reports a suspected violation under this policy, provides information to a law enforcement official or agency, or assists in the investigation of a suspected violation will suffer harassment, retaliation, reprisal, discrimination, or adverse employment action of any kind, even if a subsequent investigation determines that no violation occurred, provided the employee report is made in good faith and with reasonable belief in its accuracy. For the purposes of this policy, a reprisal includes the threat of reprisal.

No PSI employee or officer may use his or her position to influence an employee or prevent an employee from exercising his/her rights as provided in this policy. Any employee or officer who is found to have engaged in such behavior shall be subject to disciplinary action.

Employee complaints of harassment, retaliation, discrimination or adverse employment action in violation of this policy should follow the reporting procedures outlined above, and will be promptly investigated. If

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<sup>1</sup> PSI considers reportable fraud to be any act or omission that intentionally misleads, or attempts to mislead, a person or entity to obtain a financial or other benefit or to avoid an obligation. Fraud includes, but is not limited to, theft, embezzlement, misappropriation, forgery, diversion, bribery, corrupt practices, and collusion in any of the foregoing. Fraud can also be dishonesty calculated for advantage. Fraud can be either financial or non-financial and can be committed by either individuals or organizations.

an investigation results in a determination that there has been retaliation or other prohibited action against an employee, appropriate corrective action will be taken.

Employees are expected to exercise sound judgment to avoid baseless allegations. An employee who knowingly or recklessly makes an allegation or disclosure that proves to be unsubstantiated may be subject to discipline, up to and including dismissal.

Reports by employees of violations or suspected violations, as well as the identity of whistle-blowers, will be kept confidential to the extent possible, consistent with the need to conduct a thorough investigation.

In addition to reporting through the internal and external PSI channels described above, no PSI employee will be subject to discrimination, retaliation, or reprisal of any kind for reporting or disclosing to any U.S. government official information, including confidential or proprietary information, that the employee reasonably believes is evidence of a false claim, gross mismanagement, abuse of authority, or gross waste of funds relating to a federal grant or contract, a substantial and specific danger to public health or safety, or a violation of law, rule or regulation relating to a federal grant or contract. Employees who believe they have been subject to discrimination, retaliation or reprisal for such reports or disclosures may submit a complaint to the Inspector General of the donor agency in accordance with 41 U.S.C. §4712.