



Galapagos Conservancy Whistleblower and Non-Retaliation Policy

General

The policy of Galapagos Conservancy, Inc. (“Galapagos Conservancy”) requires directors, officers, employees, contractors, consultants and volunteers to observe high standards of business and personal ethics in the conduct of their responsibilities. As employees and representatives of Galapagos Conservancy, 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, employees, contractors, consultants and volunteers to comply with and to report violations or suspected violations of ethical standards, Galapagos Conservancy policies, or laws in accordance with this policy.

No Retaliation

No director, officer, employee, contractor, consultant or volunteer who in good faith reports a violation of ethical standards, Galapagos Conservancy policies, or law, shall suffer harassment, retaliation, or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within Galapagos Conservancy prior to seeking resolution outside Galapagos Conservancy.

Reporting Violations

Directors, officers, employees, contractors, consultants and volunteers should share their questions, concerns, suggestions, or complaints with someone who can address them properly. In most cases, such persons should report to the Galapagos Conservancy President. However, if any such person is not comfortable speaking with the President or is not satisfied with the response, that person is encouraged to report to the Senior Director of Operations or the chair of the Board of Directors.

Acting in Good Faith

Any good faith report, concern or complaint is fully protected by this policy, even if the report, question, or concern is, after investigation, not substantiated. Anyone filing a complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of ethical standards, Galapagos Conservancy policy, or law. Any allegations that prove not to be substantiated and have been made maliciously or with knowledge that they were false will be treated as a serious disciplinary offense.

Confidentiality

Upon the request of the complainant, Galapagos Conservancy will use its best efforts to protect the confidentiality of the complainant for any good faith report. Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Violations

All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation. The complainant will be informed that follow-up has or is occurring within two weeks after the President, or Senior Director of Operations or chair of the Board of Directors has received the report. The Board of Directors shall be informed of all reports.

Approved by the Board of Directors on 20th February 2021.