

THE TOR PROJECT, INC.

INTERNAL COMPLAINT REVIEW PROCESS

Notice: This document was written by and for the Tor Project, Inc. (“TPI”), and is intended to inform and advise TPI employees and contractors about Company policies that should inform their decisions and behavior. However, the Tor Community extends far beyond employees and contractors, and the Community has its own set of policies intended to both complement TPI’s policies in areas where it does not have its own, and to provide guidance for individuals who wish to participate in and/or contribute to the Tor Community beyond/outside of employment. For more information about the Tor Community’s policies, please contact the Community Team Lead at <https://trac.torproject.org/projects/tor/wiki/org/teams/CommunityTeam>.

A. Purpose and Scope

The purpose of this “Internal Complaint Review Process” is to afford all employees, contractors, and community members of The Tor Project (the “Company”) the opportunity to seek resolution of their work-related concerns, and provide a mechanism for presenting and resolving complaints. This policy is intended to supplement the “Employee Communications Policy” provided separately, which provides that all employees and contractors have free access to their Project Lead, or to other Company managers of their choice, to informally express their work-related concerns.

B. Procedure

1. Filing of Complaint

Individuals should file written complaints with their Project Lead or the Human Resources Manager as soon as possible after the events that give rise to the work-related concerns. The written complaint should set forth in detail the bases for the complaint.

2. Investigation

Human Resources will date and log all written complaints and send the complainant an acknowledgement that the complaint is under review.

The Human Resources Manager or her designee will investigate the complaint, meeting separately with the complainant and with others who either are named in the complaint or who may have knowledge of the facts. The Company will attempt to treat all complaints and its investigation discreetly, recognizing, however, that in the course of investigating and resolving complaints, some dissemination of information to others may be necessary or appropriate.

On completion of the investigation, Human Resources will report its findings and conclusions to the complainant. If the complaint is resolved to the individual’s satisfaction, the terms of the resolution should be recorded and signed by both the complainant and representative of Human Resources.

C. Appeal

If the complaint is not resolved to the individual's satisfaction, the complainant may submit a written request for review of the complaint to the Executive Director. On completion of the appeal review, the complainant will receive an oral explanation of the conclusion reached and the reasons for that conclusion. Decisions resulting from appeal reviews by the Executive Director will be final.

D. Non-Retaliation

Individuals are encouraged to use this complaint procedure to express their work-related concerns. There will be no retaliation or discipline toward any employee who has filed a complaint in good faith. If an individual believes that he or she is being retaliated against for lodging a complaint, the employee should immediately notify the Executive Director.

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