

<b>WHISTLEBLOWER POLICY – GLOBAL POLICY</b>	
Approved by:	<b>Michael Stambaugh, VP Human Resources &amp; Support</b>
Level:	<b>1 - Global Policy</b>
Circular:	<b>#2015-02</b>
Policy effective date:	<b>July 15, 2015</b>

## **SECTION 1 – OBJECTIVE AND SCOPE**

*This amended policy should replace the previous Whistleblower Policy, **Circular #2013-04**, that was published on January 31, 2013. One hard copy of the previous policy should be kept at the Regional Office and Country's Head Office, and all previous versions should be properly disposed of. The amended policy should be distributed to all staff accordingly.*

### **OBJECTIVE**

Women for Women International is committed to high standards of ethical, moral and legal business conduct. In line with this commitment, and Women for Women International's commitment to open communication, this policy is intended to encourage staff to report, in good faith, suspected or known occurrences of illegal or unethical events or activities ("concerns") without the fear of retribution.

Women for Women International requires all employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Employees are expected to practice honesty and integrity in fulfilling their responsibilities, and comply with all applicable laws and regulations.

### **SCOPE**

This policy applies to Women for Women International – US, Regional Offices and all Country Offices.

## **SECTION 2 - POLICY**

### **1. Responsibility**

It is the responsibility of all employees to report concerns about known or suspected illegal or unethical activities in accordance with this policy.

It is the responsibility of all employees to properly handle any whistleblower allegations from internal or external stakeholders using the guidance in this policy.

### **2. Types of concerns**

This policy is intended to cover protection of whistleblowers who raise concerns regarding illegal or unethical activities. Examples of illegal or unethical activities are:

- Violations of federal, state or local laws;
- Abuse of power or the use of Women for Women International's power or authority for any unauthorized purpose or for personal gain;
- Financial or professional misconduct;
- Violations of Women for Women International policies;
- Actions likely to cause physical danger to any person or create a risk of significant damage to property;
- Payment for services not performed or for goods not delivered, or other fraudulent financial matters;
- Any manner of abuse against colleagues, participants or any other person connected to the organization.

### 3. Good faith reporting

Anyone reporting a concern must act in good faith, without malice to WfWI or any individual in WfWI, and have reasonable grounds for believing that the information shared indicates that illegal or unethical behavior has occurred.

Although the employee is not expected to prove the truth of an allegation, the employee should be able to demonstrate to the person contacted that the report is being made in good faith. Even if the allegation turns out to be incorrect, as long as there was a reasonable basis to believe that wrongdoing was happening, the reporting is warranted.

Any report which has been made maliciously or any report which the whistleblower has good reason to believe is false will be viewed as behavior subject to disciplinary action.

### 4. Safeguards for a whistleblower

No whistleblower who reports a concern in good faith in accordance with this Whistleblower Policy shall suffer any harassment, retaliation or other adverse consequences as a result of reporting the concern or cooperating in the investigation of a concern.

Employees should report all cases of harassment and retaliation resulting from their initial reporting of a concern or cooperating in an investigation of a concern.

Any Headquarters, Regional Office or Country Office employee who believes she or he, and/or an external whistleblower, is being retaliated against should contact the VP-HR and Support and the Director of Compliance or through the alternatives provided in section 5.

WfWI will respond to any complaint that a manager, supervisor, or employee is involved in retaliation, discrimination or harassment related to the reporting or investigation of allegedly illegal or unethical conduct. If a report of discrimination, retaliation or harassment is proven, appropriate disciplinary action will be taken.

### 5. Reporting Process

Anyone can report a concern about suspected or known illegal or unethical activity conducted by Women for Women International. In other words, a whistleblower can be internal or external to the Organization. This can include, but is not limited to:

Internal whistleblowers:

- WfWI employees and interns
- Members of the WfWI Board of Directors



External whistleblowers:

- Applicants for employment
- Program participants or graduates
- Vendors/contractors
- Partners
- Donors/grantors
- General public
- Volunteers

5.1. Reporting by WfWI employees and interns

If an employee or intern knows of or has concerns about suspected or actual illegal or unethical activities, the employee should immediately report it to her/his supervisor.

5.1.1. Country Office reporting

If a Country Office employee does not wish to report the matter to her/his supervisor, then the employee can report the matter to her/his manager's supervisor or another level of management, including the Country Director. All reported concerns regarding potential illegal or unethical activities should be submitted to the Country Director, who is then responsible for notifying the Regional Director. Regional Directors are responsible to report to the VP-HR and Support and the Director of Compliance all allegations and get support from Headquarters if needed.

If a reported concern relates to actions made by the Country Director, the employee or supervisor should report it to the Regional Director, who will be accountable for solving the allegation with the support from Headquarters, in particular supported by the VP-HR and Support and the Director of Compliance.

5.1.2. Headquarters reporting

If a Headquarters employee does not wish to report the matter to her/his supervisor, then the employee can report the matter to another level of management, including their GLT member or to the Director of Compliance. All reports of illegal or unethical matters should be submitted to the relevant GLT member, who is then responsible for notifying the VP-HR and Support and to the Director of Compliance of the allegation.

If a reported concern relates to actions made by their GLT member, the employee or supervisor should report directly to the Director of Compliance directly.

If a reported concern relates to actions made by the Director of Compliance, the employee or the relevant GLT member should notify the VP-HR and Support directly.

If a reported concern relates to actions made by the CEO, the person receiving the allegation will notify the Director of Compliance and the Chair of WfWI's Audit Committee.

5.2. Reporting by members of the WfWI Board of Directors

Board members who have concerns regarding potential illegal or unethical activity should report it immediately to the Chair of the WfWI Audit Committee.

### 5.3. Reporting by participants and other external parties

Program participants must be informed of the Whistleblower Policy at the beginning of the program and in their participant agreement. They must be presented information on who to contact, how they can be contacted and what type of behavior should be reported.

An employee who receives a Whistleblower concern from a participant or other external party must follow the procedures in section 5 above.

### 6. Confidentiality

The organization encourages employees to put their names on reports to assist with appropriate follow-up questions as a complete investigation may not be possible unless the source of the information is identified. However, whistleblowers can report matters anonymously by sending an email to the following email address: [anonymous@womenforwomen.org](mailto:anonymous@womenforwomen.org). Concerns expressed anonymously will be explored appropriately, but consideration will be given to:

- The seriousness of the issue raised;
- The credibility of the concern;
- The likelihood of confirming the report from specific sources.

Concerns of suspected illegal or unethical activity will be kept confidential to the extent possible. If the concern is reported in good faith the whistleblower's identity will be kept confidential unless disclosure is required to comply with applicable legal or governmental regulations.

### 7. Handling reported concerns

WfWI will respond accurately, completely and promptly to any whistleblower that reports illegal or unethical activities or suspected illegal or unethical activities in accordance with this policy.

Only the VP-HR and Support and the Director of Compliance will have access to the anonymous email inbox ([anonymous@womenforwomen.org](mailto:anonymous@womenforwomen.org)). Both of them are responsible for managing the anonymous email inbox.

The Director of Compliance is responsible for investigating and coordinating corrective action for all reports of illegal or unethical activity, supported by the VP-HR and Support.

Any allegations against the Director of Compliance or VP-HR and Support will be investigated by the CEO.

Any allegations against the CEO will be investigated by the Audit Committee of the Board of Directors in coordination with the Chair of the Board of Directors.

How the investigation proceeds depends on the nature and seriousness of the conduct or circumstances reported, and the quantity and quality of the information provided.

All employees have a duty to cooperate in the investigation of reports under this policy, or of discrimination, retaliation or harassment allegedly resulting from the reporting or investigation of such matters.

In addition, an employee shall be subject to disciplinary action if the employee fails to cooperate in an investigation, or deliberately provides false information during an investigation.

If applicable, an external whistleblower may be contacted to provide further information to the investigation.





Once an investigation has concluded the internal whistleblower and any parties involved in the allegation shall receive a formal communication regarding the investigation, disposition or resolution of the matter submitted as applicable, subject to applicable confidentiality laws or regulations.

WfWI shall provide appropriate and timely information to the external whistleblower as needed.

If, at the conclusion of its investigation, Women for Women International determines that a violation of policy or laws has occurred, the Organization will take appropriate corrective action equal to the nature and seriousness of the offense. This action may include disciplinary action or legal action against the accused party. Reasonable steps will also be taken to prevent any further violations of policy.

#### 8. Reporting and Retention of Concerns and Investigations


The Regional Director and the Country Director should maintain a record of all allegations submitted at the Country Office for reference as needed. See Appendix B for a sample log.

The Director of Compliance will maintain a log of all concerns, tracking their receipt, investigation and resolution and shall periodically prepare a summary report for the CEO. However, this log can be requested by either the CEO or the Audit Committee at any time.

All documents related to the reporting, investigation, and enforcement of this policy shall be kept in accordance with Women for Women International's Document Retention policy and applicable laws.

### SECTION 3 - GOVERNANCE

#### RESPONSIBILITY

<b>Policy Sponsor</b>	 7/15/15 Michael Stambaugh, VP, Human Resources and Support
<b>Policy Owner</b>	Ramon Soto, Director, Compliance

#### VERSION CONTROL AND CHANGE HISTORY

Version Number	Approval Date	Approved by	Amendment
1.0	12/22/2009	GLT	Initial policy creation
2.0	2/22/2011	GLT	Policy language amended for clarification
3.0	12/11/2013	Audit Committee	Reporting lines adjusted to conform with current organizational structure
4.0	07/08/2015	GLT	Reporting lines adjusted to conform with current organizational structure

## APPENDIX A - WHISTLEBLOWER CONCERN LOG TEMPLATE

Date Reported	Reporting channel	Contact info of claimant	Target of concern	Brief explanation of issue	Follow-up Action (Date)	Referred to (Date)	Status	Conclusion date

## APPENDIX B – WFWI HEADQUARTERS CONTACT INFORMATION

Position/Title	Name	Phone	Email
Chief Executive Officer	Laurel Adams	(+1) 202-521-9405	ladams@womenforwomen.org
Chief Administrative Officer	Michelle Guillermin	(+1) 202-670-9905	mguillermin@womenforwomen.org
Director, HR and Organizational Development	Claude Diwouta	(+1) 202-826-3384	cdiwouta@womenforwomen.org
Director, Field Finance and Compliance	Norman Gachoka	(+1) 202-595-1133	ngachoka@womenforwomen.org

*As of February 2020*

## APPENDIX C - STAFF ACKNOWLEDGEMENT

My signature confirms that I have read the Whistleblower Policy updated in July 2015 and that I understand my responsibilities to report any knowledge or suspicion of unethical and illegal activities.

I further acknowledge that I am currently not aware of any activity that would require disclosure under this or other policies or procedures.

Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Date signed: \_\_\_\_\_