

WHISTLEBLOWER POLICY

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1.0 Purpose

International Medical Corps has a Code of Conduct & Ethics and related policies that require its staff and partners to adhere to the highest standards of business and personal ethics. Staff and partners must conduct themselves with honesty and integrity, comply with all applicable laws and regulations, and maintain a culture of ethical conduct.

The purpose of this Whistleblower Policy is to (a) set forth the requirement that International Medical Corps staff and partners report suspected misconduct, (b) explain how staff and partners who may have concerns about misconduct can report their concerns, (c) describe how International Medical Corps receives, reviews and addresses such reports, and (d) set forth International Medical Corps' protections against retaliation for reporting concerns about misconduct.

2.1 Definitions

2.2 Misconduct. The following is an indicative list of the types of violations of International Medical Corps' Code of Conduct & Ethics that may be reported within the scope of this policy. The list is not intended to be exhaustive:

- Fraud, theft, or diversion;
- Bribery or other corrupt practices;
- Money laundering;
- Waste or misuse of assets;
- Falsification, alteration or substitution of company records;
- Sexual exploitation and/or abuse;
- Trafficking in persons violations;
- Child or adult-at-risk safeguarding violations;
- Workplace bullying, sexual misconduct, other forms of harassment and/or abuse of power or authority;
- Inappropriate and/or undisclosed conflicts of interest;
- Authorizing, directing or participating in breaches of policy;
- Failure to comply with the various compliance programs of the organization;
- Deliberately failing to report breaches of policy, concealing such breaches or deliberately withholding relevant information concerning a breach; and
- Any other violations of International Medical Corps' Code of Conduct & Ethics or related policies.



2.3 *Partner* means International Medical Corps sub-recipients, partner organizations, contractors, consultants, and any other individual or entity that acts on International Medical Corps' behalf or at International Medical Corps' direction.

2.4 *Staff* means International Medical Corps directors, trustees, officers, employees, volunteers, and interns.

3.0 Scope

This policy applies to International Medical Corps staff and partners in all locations at all times, to include International Medical Corps country offices and project sites, including during emergency relief responses. This policy applies to all International Medical Corps partners and staff whether on duty or off duty.

4.0 Reporting Responsibility

If a staff or partner knows of or suspects misconduct, it is that individual's obligation to immediately report that information in accordance with this policy. Staff and partners should never attempt to conduct their own investigations.

5.1 How to Submit a Report

5.2 Individuals are encouraged where possible to report suspicions of misconduct to their manager or supervisor, or to International Medical Corps' reporting email address: report@InternationalMedicalCorps.org. Managers and supervisors who receive reports of misconduct from other staff are required to immediately escalate these reports to their manager/supervisor or to the headquarters' Ethics & Compliance Department (report@InternationalMedicalCorps.org) or Human Resources Department.

5.3 If reporting to a manager or supervisor is not possible and/or the person wishes to report confidentially or anonymously, the International Medical Corps Reporting Hotline is a comprehensive reporting system that allows individuals to file secure, confidential and anonymous reports via the phone (available in some locations) or Internet. This system is hosted and managed by EthicsPoint – a third-party provider of reporting systems.

- EthicsPoint reports may be made via phone from some areas by calling your respective country hotline at the number listed at <http://www.internationalmedicalcorps.ethicspoint.com/>.
- EthicsPoint reports may be made online at www.internationalmedicalcorps.ethicspoint.com.

5.4 Reporters are encouraged to put their names on allegations because appropriate follow-up questions and investigation may not be possible unless the source of the information is identified. Reports may be made in any language. If a report is made anonymously through EthicsPoint, the reporter is encouraged to review the report online regularly as an investigator may ask questions through the EthicsPoint portal.

5.5 Staff and partners should **never attempt** to conduct their own investigation before making a report.

6.1 Treatment of Reports

- 6.2 Depending on the nature of a report, it may be referred for review to International Medical Corps' Ethics & Compliance or Human Resources Department. Reports of financial misconduct (such as fraud, corruption, bribery, or diversion) or safeguarding violations (such as sexual exploitation and abuse or human trafficking) are referred to the Ethics & Compliance Department for investigation, which reports independently from management to International Medical Corps' Board of Directors. Reports of other workplace misconduct are referred to the Human Resources Department.
- 6.3 International Medical Corps reviews all reports of misconduct and promptly follows up on the reports by communicating with the individual who submitted the report to acknowledge receipt. Where reported misconduct may affect an individual's physical or emotional safety or well-being, International Medical Corps will seek to ensure the safety and security of any individual at risk as well as the safety of any other staff and communities that could be at risk.
- 6.4 All staff and partners are obligated to cooperate fully in the investigation process. Failure to cooperate will result in disciplinary action, up to and including termination of employment or contractual relationship with International Medical Corps.
- 6.5 International Medical Corps will ensure a comprehensive review of reports that are deemed to merit further investigation to the extent it is feasible. The investigation team, methodology, and duration will depend on the type of allegation. The reviewing department (Ethics & Compliance or Human Resources) will ensure that all investigations are documented in writing with details of the investigative means and methodology, evidence, factual conclusions and corrective measures. Questions about investigations may be directed to compliance@InternationalMedicalCorps.org.
- 6.6 In the event a report is determined to not be credible (whether because of lack of details or another reason) or it does not allege a violation of International Medical Corps' Code of Conduct & Ethics or related policies (or other illegal or unethical conduct) and will not be investigated, the reviewing department will ensure that such determination is made in writing with justification for that determination.
- 6.7 Reports of concerns and investigations will be kept confidential to the extent possible, consistent with the need to investigate and notify third parties as required by laws or regulations.
- 6.8 If possible, the individual who reported misconduct will be informed what happened with the complaint. In many cases, the information provided to the reporter must be kept to a minimum given the need for confidentiality.

7.1 Safeguards.

- 7.2** International Medical Corps strictly prohibits retaliation against staff and partners who report (suspected or actual) misconduct in good faith. Retaliation against an individual for report violations in accordance with this policy or participating in investigations of such is a separate violation of this policy and will be subject to disciplinary action up to and including termination of employment or contractual relationship with International Medical Corps. Reports of attempted or actual retaliation should be made through any of the mechanisms described in section 5 above. No adverse employment action, such as termination or counseling will be taken against any staff in retaliation for reporting allegations that the staff reasonably believes to be true.
- 7.3** Individuals making allegations with reckless disregard for their truth or falsity may be subject to disciplinary action, up to and including termination of employment or contractual relationship with International Medical Corps.

8.1 Responsibilities

- 8.2** All International Medical Corps staff are responsible for reading, understanding, and complying with this policy, International Medical Corps' Code of Conduct & Ethics and other policies and procedures, as well as completing any associated training.
- 8.3** Managers at all levels have a particular responsibility to model appropriate behavior, and support and develop systems that create and maintain an environment that prevents violations of International Medical Corps policies.
- 8.4** All supervisors must make themselves available to hear their staff members' concerns and respond appropriately. Supervisors are responsible to make sure that there is no retaliation against staff members who report misconduct.