

Evidence Action

Global Whistleblower Policy

Global Whistleblower Policy	Policy Effective Date: 1 November 2020
	Last Revised: 1 November 2020
	Department of Origin: Legal
	Policy Number: LG.G.03

PURPOSE

Evidence Action requires all board members, employees, interns, and contractors to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As board members, employees, interns and contractors of Evidence Action we must practice honesty and integrity in fulfilling our responsibilities and comply with all Evidence Action policies as well as applicable laws and regulations.

POLICY

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns and/or report potential violations so that Evidence Action can take corrective actions for inappropriate conduct. It is the responsibility of all board members, employees, contractors, and interns to report concerns about violations of Evidence Action's Global Code of Conduct or suspected violations of laws, regulations or policies that govern Evidence Action's operations.

Examples of illegal or dishonest activities include, but is not limited to the following:

- Violations of federal, state, national, or local laws;
- fraud and / or misappropriation of funds;
- bribery, corruption and kickbacks;
- breaches of the Code of Conduct, including without limitation, sexual harassment, discrimination, bullying and harassment; ; and
- fraudulent financial reporting.

PROCEDURES

Evidence Action has an open door policy and requests that employees share their concerns or complaints of serious violations, such as those listed above. The order of preference for reporting is as below, acknowledging that there are circumstances where an employee may submit the report directly to a higher level if others in the reporting line are potentially implicated in the matter, or if in the employee's judgement it is a serious violation that should be escalated immediately to a higher level.

- their direct supervisor
- local Human Resources Representative
- country lead
- regional Human Resources office
- member of the Global Leadership Team
- Chief People Officer

If employees prefer to report the matter anonymously or without first reporting to anyone above, they can do so through Evidence Action's confidential EthicsPoint platform, managed by an external service provider, NAVEX Global Inc. EthicsPoint is monitored by the service provider and matters are reported to the Chief People Officer for review and investigation. Where the matter relates to the Chief People Officer, the matter is reported to the CFAO.

Persons receiving a complaint or notification of a potential serious violation related to the following topics must report it to the local HR representative, or the Chief People Officer where the local HR representative is potentially implicated:

- Accounting and auditing matters
- Bribery, corruption, or kickbacks
- Conflicts of Interest
- Disclosures of confidential information
- Discrimination or harassment
- Donor Stewardship
- Falsification of contracts, reports or records
- Misconduct of inappropriate behavior
- Safety
- Theft
- Violation of policy
- Violation of procurement procedures

The local Human Resources Representative will log these cases in EthicsPoint and advise the Chief People Officer of the complaint.

If the local Human Resources representative is believed to be involved in the matter, then supervisors are directed to contact the Chief People Officer, who will coordinate an investigation and manage any potential corrective actions.

When a concern and/or potential serious violation is reported, Evidence Action will evaluate the information received and decide on the appropriate next steps, including conducting an investigation where warranted. The investigation will be confidential and a reporter's request for anonymity will be respected. Except when specifically authorized by the Chief People Officer, the complainant may neither investigate independently nor resolve any alleged misconduct or potential serious violation of company policy.

Handling of Reported Violations

Evidence Action's Chief People Officer receives the report from the supervisor, local HR or EthicsPoint and will promptly review the information provided. Based on the review, the Chief People Officer will determine the type of complaint, if local laws apply and if the complaint needs to be addressed by a local or regional office or if the Global office will continue the investigation. It will also be determined if external service providers, such as lawyers or auditors need to be involved. Evidence Action's board members, employees, contractors, and interns are required to cooperate in good faith in any investigation resulting from a report.

Once the investigation is completed, the Chief People Officer or the appointee will recommend an appropriate course of action, including any potential disciplinary action.

Acting in Good Faith

It is contrary to the values of Evidence Action for anyone to retaliate against any board member, employee, intern, or contractor who in good faith reports a serious concern or potential violation. An employee who retaliates against someone who has reported a violation in good faith is subject to disciplinary action.

In reporting any concern or potential violation, reporting misconduct or cooperating in any investigation, an employee must act in good faith. This does not mean that the employee needs to be correct, nor does it mean that the employee's complaint or concern must have substantial facts to support it. It requires only that the information that is being provided has not been fabricated or presented in an intentionally misleading manner.

Alternatively, if an allegation is found to have been made frivolously, in bad faith, maliciously or for personal gain or revenge, the employee making the claim will be subject to disciplinary action.

Confidentiality

All information will be treated confidentially. As noted above, all good faith allegations will be treated seriously and will be handled in accordance with this policy. Confidentiality, in so far as is possible, will be maintained for all reports made in good faith, and where reports are made anonymously, such anonymity will be respected. If the allegations result in criminal activity being reported to the police, the identity of the person submitting the report may eventually have to be disclosed to external investigators or the police to allow for full investigation.