



SafeHavens Organization

Whistleblower Policy

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Version 1

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1. Introduction and Purpose of Document

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that SafeHavens (SHs) can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees and volunteers to report concerns about violations of SHs code of ethics or suspected violations of law or regulations that govern SHs operations.

SHs requires directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the SHs, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

2. No Retaliation

It is contrary to the values of SHs for anyone to retaliate against any board member, officer, employee or volunteer who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of SHs. 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.

3. Reportable Conduct

- a. Who can make a report?
 - i. A Whistleblower is a person who, whether anonymously or not, attempts to report misconduct or dishonest or illegal activity that has occurred in connection with SHs, and wishes to avail themselves of protection against reprisal for having made the report.
 - ii. A Whistleblower may be a current or former Stakeholder of SHs.
- b. How to know what to report?

i. A person may disclose any information that the person has reasonable grounds to suspect concerns misconduct, or an improper state of affairs or circumstances in relation to:

1. SHs; or
2. A related body corporate of SHs
3. An in-country partner organization/project of SHs

c. What is Reportable Conduct

Reportable Conduct is any past, present or likely future activity, behavior or state of affairs considered to be:

- i. dishonest;
- ii. corrupt (including soliciting, accepting or offering a bribe, or facilitating payments or other such benefits);
- iii. fraudulent;
- iv. illegal (including theft, drug sale or use, violence or threatened violence, or property damage);
- v. in breach of regulation, internal policy or code (such as our Code of Conduct);
- vi. improper conduct relating to accounting, internal controls, compliance, actuarial, audit or other matters of concern to the whistleblower;
- vii. a serious impropriety or an improper state of affairs or circumstances;
- viii. endangering health or safety;
- ix. damaging or substantially risking damage to the environment;
- x. a serious mismanagement of SHs's resources;
- xi. detrimental to SHs's financial position or reputation;
- xii. maladministration (an act or omission of a serious nature that is negligent, unjust, oppressive, discriminatory or is based on improper motives);
- xiii. concealing reportable conduct.
- xiv. Reportable Conduct usually relates to the conduct of employees or directors, but it can also relate to the actions of a third party, such as a funder, customer/client, supplier or service provider.

d. What is not Reportable Conduct?

- i. While everybody is encouraged to speak up and report any concerns to SHs, not all types of conduct are intended to be covered by this Policy. This Policy does not apply to personal work-related grievances unless the grievance includes victimization due to whistleblowing. Those matters are dealt with under other policies.
- ii. Personal work-related grievances are those that relate to the discloser's current or former employment with SHs that might have implications for the discloser personally but do not: a) Have any other significant implications for SHs (or another entity); or b) Relate to any conduct or alleged conduct about a disclosable matter
- iii. Personal work-related grievances include grievances such as interpersonal conflicts, decisions about promotions, decisions that do not involve a breach of workplace laws, or terms and conditions of employment.

1. However, personal work-related grievances may be covered by this policy where they include information about misconduct, an allegation that the entity has breached employment or other laws punishable by imprisonment by a period of 12 months or more, or the grievance includes victimization due to whistleblowing.
- e. What information do I need to make a report?
 - i. To make a protected report you must know of or have reasonable grounds to suspect the Reportable Conduct.
 - ii. For a report to be investigated, it must contain enough information to form a reasonable basis for investigation. It is important therefore that you provide as much information as possible. This includes any known details about the events underlying the report such as the: Date, time, location, name of person(s) involved, possible witnesses to the events, evidence of the events etc.
 - iii. In your report, include any steps you may have already taken to report the matter elsewhere or to resolve the concern.

4. Reporting Procedure

SHs has an open door policy and suggests that employees share their questions, concerns, suggestions or complaints with their manager. If you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with the CEO or Board Chair. Managers are required to report complaints or concerns about suspected ethical and legal violations in writing to SHs compliance officer, CEO or Board Chair, who has the responsibility to investigate all reported complaints. Employees with concerns or complaints may also submit their concerns in writing directly to their manager or the CEO/Board Chair or the organization's Compliance Officer [or other designated person].

5. Compliance Officer (or CEO, Board Chair or other nominated compliance person)

SHs CEO is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The CEO will advise the CEO/Board Chair of all complaints and their resolution and will report at least annually to the full Board / Auditor on compliance activity relating to accounting or alleged financial improprieties.

6. Accounting and Auditing Matters

SHs CEO shall immediately notify the Board/Board Chair of any concerns or complaints regarding corporate accounting practices, internal controls or auditing and work with the committee until the matter is resolved.

7. Acting in Good Faith

Anyone filing a written 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. Any allegations that prove not to be substantiated and which prove to

have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

8. Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

9. Handling of Reported Violations

The CEO will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation within 48 hours of receiving the complaint. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

Policy approved by the Board of Directors on {Date}.