



## WC USA – HR – Whistleblower Policy

### **Position Statement**

It is in both the public interest, and the organization's interest, to maintain confidence in the integrity of the operation of War Child USA (WC USA). WC USA's internal controls and operating procedures are intended to detect, prevent, or deter improper activities, however, at times these systems may not provide perfect safeguarding. WC USA is committed to complying with the laws and regulations to which it is subject and to protecting the funds, assets, and resources (including human resources) of the organization.

The purpose of this policy is to provide guidelines for reporting wrongdoing and to provide reasonable protection from reprisal for those persons who, in good faith and with reasonable belief, report wrongdoing in accordance with this policy.

### **Scope**

This policy applies to all Board members, officers, consultants, employees, and volunteers of War Child USA, whether they work on a full-time or part-time basis, so as to provide reasonable protection from reprisal for all Board members, officers, consultants, employees, and volunteers of WC USA, who in good faith report wrongdoing under this policy.

This policy covers matters that are in the public interest, and for which there are no existing processes for reporting and investigation.

### **Reporting Responsibility**

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that WC USA can address and correct inappropriate conduct and actions. It is the responsibility of all Board members, officers, consultants, employees, and volunteers to report concerns about violations of WC USA's code of conduct or suspected violations of laws or regulations that govern WC USA's operations.

### **No Retaliation**

It is contrary to the values of WC USA for anyone to retaliate against any Board members, officers, consultants, employees, and volunteers 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 WC USA. Anyone who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of their relationship with WC USA.

## **Reporting Procedures**

WC USA operates with an open-door policy, inviting anyone to freely express their questions, concerns, suggestions, or complaints.

Please email [info@warchildusa.org](mailto:info@warchildusa.org) with any issues WC USA should be made aware of.

## **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.

## **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.

## **Handling of Reported Violations**

WC USA All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation.

## **Violation or Breach of Policy**

Board members, officers, consultants, employees, and volunteers are expected to cooperate fully in an investigation under this policy. Anyone who is contacted by the media regarding an investigation under this policy must refer all inquiries to the President & Founder.

Violation of this policy is a fundamental breach of the relationship with WC USA and is subject to progressive disciplinary action possibly leading to termination of the relationship with WC USA.