



## YANK WHISTLE BLOWER POLICY

Approved by YANK Board Chair	Effective Date	Policy Document #

**Purpose:**

The purpose of this document is to outline and define organization's policy regarding the investigation of confidentially reported allegations of "Misconduct" (as defined below) by YANK its management, or its agents.

**Overview**

**Purpose** The purpose of this document is to outline and define organization's policy regarding the investigation of confidentially reported allegations of "Misconduct" (as defined below) by the organization, its management, or its agents. This guideline will establish the general principle that all employees throughout the organization are encouraged to report evidence of misconduct and shall not be retaliated against for doing so. This Policy provides further detailed implementation steps for that principle.

**Scope**

This policy applies to all organization staff (covering all employment categories including, without limitation full-time, part-time, contract and temporary employees), interns, volunteers, board members, and Patron. Additionally, this policy is available as a reporting mechanism to all beneficiaries, donors, sponsors, visitors, contractors, and vendors of the organization. This policy also is available as a reporting mechanism to employees of other legal entities within the Country, although in such cases the investigations procedures may be adjusted in coordination with appropriate management of the other relevant legal entities.

**POLICY**

The organization endeavors to promote a culture reflective of the highest standards of legal and ethical conduct. In keeping with this ideal, the organization is committed to providing a work environment that promotes these standards through its personnel selections, management oversight, business policies, processes and controls, and reporting and compliance procedures. This will provide framework for reporting allegations of Misconduct, in a confidential manner, in the event that other methods of detection fail or become inadequate, which helps ensure that violations will be detected and corrective action taken.

Accordingly, the organization will:

- Maintain Integrity procedures for the receipt, retention, and treatment of allegations of Misconduct;
- Provide a mechanism allowing persons ("Reporters") to report Misconduct in a confidential manner;
- Investigate all complaints as appropriate;
- Take appropriate corrective action where claims of Misconduct are substantiated;
- Take appropriate corrective action in the event that false allegations are made.

- Not tolerate retaliation against any good faith Reporter or anyone who cooperates in an investigation.

Any person who violates this policy shall be subject to corrective or disciplinary action, as deemed appropriate by organization.

“Misconduct,” defined as including any of the following:

- i. Violations of law;
- ii. Violations of the organization policy;
- iii. Actions perceived as unethical;
- iv. Other matters which may cause financial loss or damage its reputation or be otherwise detrimental to its interests.

This process will be in addition to

- Lodging an Allegation
- Normal reporting channels favored

A person who detects, or has reasonable grounds for suspecting, Misconduct is encouraged to raise such concerns with their immediate manager through normal reporting channels.

### **Content of Allegations**

An allegation of Misconduct should contain as much specific factual information as possible, including:

- i. All facts describing the alleged event, issue, or matter;
- ii. The name of each person involved;
- iii. Dates, times, frequency, and locations;
- iv. Facts relevant to urgency; and
- v. Documentation, witnesses, or other evidence available to support the allegation, including any laws or policies believed to be breached.

### **Treatment of Allegations**

An allegation will be diligently acknowledged, recorded, and considered by the Committee or its representatives.

All allegations will be noted and investigated and appropriate action taken.

As part of the investigation, any person(s) whose behavior has been implicated will be informed, as appropriate, of the investigation and given the opportunity to provide evidence.

**Confidentiality and Anonymity**

- Confidentiality, with respect to (i) the identity of the Reporter and (ii) the data revealed by the Reporter, will be maintained in confidence.
- Anonymous reports are discouraged, as they have a greater potential for abuse, can make investigation of the allegations more difficult, and are subject to legal limitations in some countries.
- Compliance with data privacy and other applicable laws