



*We Believe Love Transforms*

## **WHISTLE BLOWER POLICY**

### **POLICY and PURPOSE**

Hope Against Trafficking 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 Hope Against Trafficking, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

### **APPLICATION**

#### Reporting Responsibility

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that Hope Against Trafficking 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 Hope Against Trafficking's code of ethics or suspected violations of laws or regulations that govern Hope Against Trafficking's operations.

#### No Retaliation

It is contrary to the values of Hope Against Trafficking 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 Hope Against Trafficking. 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.

#### Reporting Procedure

Hope Against Trafficking has an open-door policy and suggests that employees or volunteers share their questions, concerns, or complaints with their supervisor. If an employee or volunteer's supervisor is the subject of, or involved with, such questions, concerns, or complaint, then the employee or volunteer should go to the executive director. Concerns or complaints may also be submitted in writing directly to the executive director or the President of the Board.

#### Compliance Officer

The President of the Board is responsible for ensuring that all complaints of unethical and illegal conduct are investigated and resolved. The president of the board of Hope Against Trafficking will advise the board of directors of complaints and their resolution.

Acting in Good Faith

Anyone filing a 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 knowing 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

The President of the Board will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation.