

WVI MANAGEMENT POLICY



TITLE: Integrity & Protection Hotline (Whistle blower)

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1. OVERVIEW

1.1. Purpose

The purpose of this document is to outline and define World Vision International’s policy regarding the investigation of confidentially reported allegations of “Misconduct” (as defined below) by World Vision International (WVI), its management, or its agents. The World Vision Partnership Code of Conduct Guidelines establish the general principle that all employees throughout the Partnership 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.

1.2. Scope

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

1.3. Effective Date

The effective date of this **revised** policy is 1 May 2013

1.4. Contextualization

Contextualisation is not permitted.

2. POLICY

2.1 WVI endeavors to promote a corporate culture reflective of the highest standards of legal and ethical conduct. In keeping with this ideal, WVI 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. In addition, WVI provides the process stated herein 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.

2.2 Accordingly, WVI will:

- 2.2.1 Maintain Integrity and Protection Hotline (“IPH” or “whistleblower”) procedures for the receipt, retention, and treatment of allegations of Misconduct;
- 2.2.2 Provide a mechanism allowing persons (“Reporters”) to report Misconduct in a confidential manner;
- 2.2.3 Investigate all complaints as appropriate;
- 2.2.4 Take appropriate corrective action where claims of Misconduct are substantiated;
- 2.2.5 Take appropriate corrective action in the event that false allegations are made and/or the IPH process is abused;
- 2.2.6 Not tolerate retaliation against any good faith Reporter or anyone who cooperates in an investigation.

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

2.4 Misconduct Covered by the IPH Procedures

- 2.4.1 The IPH procedures are intended to address allegations of “Misconduct,” defined as including any of the following:
 - i. Violations of law;
 - ii. Violations of WV policy;
 - iii. Actions perceived as unethical;
 - iv. Other matters which may cause financial loss to WVI or damage its reputation or be otherwise detrimental to its interests.
- 2.4.2 Generally, the IPH process should not be used for matters handled by the People & Culture (P&C) grievance process (e.g., sexual harassment allegations, dissatisfaction with a manager, complaints about the work environment, issues concerning pay or benefits). These should be referred to the appropriate P&C representative. In the event the P&C grievance process is perceived as inadequate or inappropriate, allegations may be lodged with the IPH process, where the IPH intake team will evaluate whether to accept it as an IPH matter or refer it back to the appropriate P&C process.

2.5 Lodging an Allegation

2.5.1 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.

2.5.2 In General

If a person does not believe reporting concerns about possible Misconduct to their immediate manager through normal reporting channels is appropriate or possible, the report may be made directly to the IPH, which is operated by an independent third-party vendor with multilingual support. Allegations may be submitted by telephone or online.

2.5.3 To report an allegation by phone or online, one should visit the IPH website at

www.worldvision.ethicspoint.com

- Here you may verify your local toll-free number, or make a report using the website.
- If you do not have access to the internet, please follow these instructions to contact the hotline:

1. From an outside line contact your local operator.

2. Request a reverse charge or collect call to be placed to the United States, to the number below.
3. When the operator asks who is placing the call, give your company name.
4. All reverse charge or collect calls will be accepted by the EthicsPoint Contact Center. +1-503-726-3990

2.6 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.

2.7 Treatment of Allegations

- 2.7.1 An allegation will be diligently acknowledged, recorded, and screened by the IPH team.
- 2.7.2 All bona fide reports will be notified to appropriate WVI management and investigated by the IPH team or its designee(s) and conclusions forwarded, under strict confidentiality rules, to the appropriate WVI leadership for appropriate corrective action.
- 2.7.3 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.
- 2.7.4 If the person whose behavior has been implicated by an allegation is the WVI President or a member of the WVI board, the WVI board shall be informed and provided with oversight of the investigation.
- 2.7.5 At the conclusion of the investigation, a case closure response will be sent to the Reporter informing them the IPH process has been followed and has now been completed.
- 2.7.6 If there is abuse of the process by the Reporter, WVI reserves the right to pursue disciplinary action, as appropriate.

2.8 Confidentiality and Anonymity

- 2.8.1 Confidentiality, with respect to (i) the identity of the Reporter and (ii) the data revealed by the Reporter, will be maintained through the IPH process to the fullest extent practicable.
- 2.8.2 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. If a Reporter wishes to remain anonymous, the IPH system will accept the report, and the anonymity of the Reporter will be a factor evaluated by the IPH team in assessing how to handle the allegations.

2.9 Compliance with data privacy and other applicable laws

The IPH process will be adjusted as necessary to comply with data privacy and other laws applicable to a known location of a Reporter and the location of the alleged Misconduct. This may include, for example, restrictions on accepting anonymous reports, specified notifications to persons implicated by the allegations, and the destruction of data relating to the allegations within a specified time frame.