

Reporting/Disclosure Duty and Whistleblower Protection

Reinforcing a culture of respect, integrity, accountability, and transparency.

The Project HOPE Ethics and Compliance Programs were designed to ensure that Project HOPE Staff¹ feel empowered and obligated to reinforce a culture of respect, integrity, accountability, and transparency. Project HOPE's Code of Ethics and other policies were designed to help Project HOPE Staff comply with international humanitarian principles, national and local laws, rules and regulations, and to provide guidance to ensure the highest level of ethical behavior.

We seek to reinforce a culture where Project HOPE Staff, contractors and partners feel a duty to disclose, in good faith, and feel confident that there will be an impartial investigation without retaliation for the disclosure:

- ✓ Red flags, suspicions, or concerns with regard to any expenditure, transaction, relationship, financial practice, or questionable activity
- ✓ Activities or behaviors inconsistent with:
 - Project HOPE's Code of Ethics
 - Project HOPE Policy or Procedures
 - Sound financial practices regarding Project HOPE activities
- ✓ Potential fraud or other potential illegal act
- ✓ Potential violations of international humanitarian principles, national or local laws, rules and regulations

Project HOPE Staff have an obligation and duty to report and or disclose, in good faith, any alleged violations of the Project HOPE Code of Ethics or any Project HOPE Policy. Reporting unethical conduct, illegal behavior, fraud, abuse, or waste is a mandatory obligation of all Project HOPE Staff and contractors/vendors and partners through contractual obligations.

Project HOPE Staff who have knowledge of conduct that could potentially harm Project HOPE have an obligation to report such conduct. By not reporting violations, you would be acting in violation of Project HOPE policy and acting contrary to the best interests of Project HOPE, both a violation of the Code of Ethics.

Project HOPE Staff may in good faith report, without fear of retaliation, activity or behavior inconsistent with the Project HOPE Code of Ethics or any Project HOPE policy; any concern with regard to any financial matters regarding a Project HOPE activity, including Project HOPE's or an implementing partner's corporate accounting practices, internal controls or auditing accounting, internal accounting controls and auditing matters, by contacting:

- General Counsel & Chief Compliance Officer: jsoyars@projecthope.org. Skype (julia.soyars) Phone/ WhatsApp: +1 540-429-1781
- Project HOPE Speak Up line: online reporting at: <https://app.mycompliancereport.com/report?cid=PHOPE>

¹ Project HOPE Staff means all Project HOPE employees, interns, day laborers, volunteers and consultants and other authorized representatives unless stated otherwise in a specific Ethics Code Policy Module.

Reports may also be made to any Project HOPE supervisor, Project HOPE senior Country Office management, or headquarters senior leadership team.

Any Project HOPE supervisor, Project HOPE senior Country Office management, or headquarters Senior Leadership Team who receives a credible Report, or who observes behavior in violation of the Code of Ethics or other policy, is required to immediately forward the Report to the General Counsel & Chief Compliance Officer: jsoyars@projecthope.org. Skype (julia.soyars) Phone/WhatsApp: +1 540-429-1781. Transparency and accountability are key for an effective Reporting/Disclosure duty and whistleblower protection.

Reports involving accident, death, injury to Project HOPE Assets, or persons should be made using the Reporting a Serious Incident Form (HR 600.8-G Revised).

Investigation Procedure:

Project HOPE will conduct a fair, thorough, and timely investigation into all Reports submitted under the policy. If Project HOPE receives a credible Report from a Project HOPE Staff member or any other source alleging a violation of the Code of Ethics or Project HOPE policy, Project HOPE's General Counsel & Chief Compliance Officer will coordinate with the Chief Executive Officer and Chair of the Audit Committee of the Board of Directors to conduct an investigation, if determined appropriate, in accordance with this policy and applicable laws and regulations. When appropriate, Project HOPE may engage an outside investigator.

All Project HOPE Staff, and contractors and partners through contractual agreements, are required to cooperate as needed in an investigation and must provide full and truthful information. Individuals who are not employees but who have reported a violation under this policy or have allegedly violated this policy will be expected to participate in an investigation so that Project HOPE can discharge its responsibilities.

Both the individual who has Reported, the target of the Report (if different than the individual who Reported), will be offered an opportunity to be interviewed or to otherwise respond to a Report under this policy. Project HOPE will protect and interview all individuals identified as victims of or witnesses to prohibited activities in a safe and confidential manner. Project HOPE will protect all individuals suspected of being victims of or witnesses to prohibited activities by ensuring suspected victims are not dismissed without cause, by working with the relevant in-country authorities to ensure application of the relevant laws, prior to returning to the country from which the employee was recruited. Project HOPE will not prevent or hinder employees from cooperating fully with government authorities or law enforcement personnel.

Project HOPE will keep the investigation confidential to the greatest extent possible, consistent with a fair and full investigation. However, Project HOPE retains the right to inform those with a "need to know" about the allegation and/or the findings of the investigation. Project HOPE, as necessary, will notify the proper donor agency, and, if appropriate, the applicable law enforcement personnel.

In the event an investigation involves a project funded by the U.S. or foreign government, Project HOPE Senior Leadership Team will be responsible for promptly notifying the responsible Government agency or contracting officer and the appropriate agency Inspector General of the allegation and investigation plan.

If needed, based on the alleged facts, Project HOPE may use interim measures, such as a leave of absence, while the investigation proceeds. To the fullest extent possible, the individual who made a Report will not be subject to any interim measure that disadvantages the individual unless that individual explicitly requests a particular interim measure.

Project HOPE Staff will cooperate with any law enforcement personnel and U.S. Government agencies responsible for any investigations, audits, or corrective actions, including, but not limited to, providing timely and complete responses to document requests, and providing reasonable access to Project HOPE documents, facilities, and staff.

If an investigation reveals a violation of the Code of Ethics or any Project HOPE policy, Project HOPE will take corrective action that is proportionate to the prohibited behavior. Proportionality means that the corrective action may include an oral warning, a written warning, suspension (with or without pay), or termination of employment. It may also include requesting formal involvement of federal or local authorities when applicable. Whether or not a violation of the policy is found, preventive action may be indicated, to include additional training for all Project HOPE Staff.

Anyone filing a Report must be acting in good faith and have reasonable grounds for the Report. Any allegations that are not substantiated and proven to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

VI. Prohibition of Retaliation

Project HOPE Staff members should feel confident that there will be an impartial investigation of any alleged violations of the Code of Ethics or any Project HOPE policy. Project HOPE will not tolerate retaliatory actions for good faith compliance with the reporting requirements of this policy. This policy prohibits all forms of retaliation, and Project HOPE will take swift corrective action against any individual found to have engaged in any form of retaliation.