



***Be Peace. Choose Peace. Create Peace.***

## WHISTLEBLOWER PROTECTION POLICY

Approved by the Board of Directors on 04172016

### Policy Purpose

To encourage reporting of illegal, unethical, or policy non-compliant conduct, gross mismanagement or waste of funds, abuse of authority, or substantial and specific danger to public health or safety by Peace Through Action USA (the "Corporation"); and further to protect reporting persons from retaliation.

### Definitions

1. Interested Person – Any director, officer, employee, contractor, volunteer, beneficiary of the Corporation's programs and services, or other person with a specific interest in the Corporation.
2. Retaliation – Any action harmful to an interested person, including reprisal, recrimination, demotion, interference with lawful employment or livelihood, removal from assignment, or deprivation of the Corporation's programs and services.
3. Violation – An alleged, potential, actual, or prior illegal, unethical, or policy non-compliant act, gross mismanagement or waste of funds, abuse of authority, or substantial and specific danger to public health or safety by the Corporation or one or more of its directors, officers, employees, contractors, or volunteers, about which an interested person in good faith has reasonable cause to believe is credible.

### Policy

1. Peace Through Action USA (the "Corporation") shall comply with all applicable laws governing reporting of violations and the protection from retaliation of reporting persons.
2. The Corporation advises interested persons to promptly report violations to the Corporation and/or to an appropriate public authority.
3. Interested persons may report violations by attribution or anonymously.
4. The Corporation shall protect the confidentiality of interested persons who report violations, to the maximum extent possible, with the understanding that confidentiality may not be maintained where identification is required by law or in order to enable the Corporation or public authority to conduct an adequate investigation.
5. Interested persons, when reporting violations, shall report to the chief executive officer of the Corporation or their designee, except if the violation involves the chief executive officer, the interested person shall report to the Board of Directors chair or their designee.
6. Interested persons, when reporting violations to a public authority, may report to any appropriate public authority, including the Attorney General of the District of Columbia and the U.S. Internal Revenue Service.
7. The Corporation shall give an interested person the opportunity to disclose to the Corporation all material facts pertaining to the violation.
8. The chief executive officer or designee, or Board of Directors chair or designee, shall review material facts presented and determine the appropriate course of action, to include
  - a) investigation and action by the chief executive officer or designee, b) referral for investigation, discussion, and decision to the Board of Directors or committee with Board of Directors delegated powers, c) investigation by and recommendation to the chief

executive officer or Board of Directors chair from a disinterested person retained by the Corporation, and/or d) referral to an appropriate public authority.

9. The Corporation shall inform the interested person of the Corporation's decision resulting from the interested person's report of a violation.
10. The Corporation shall protect interested persons from retaliation for reporting violations.
11. The chief executive officer or their designee shall maintain records pertaining to reports of violations and the Corporation's responses and decisions thereto.
12. The Board of Directors secretary shall ensure that minutes of the Board of Directors and committees with Board of Directors delegated powers contain a record of any Board or committee investigation, discussion, and decision pertaining to a violation.
13. The Corporation instructs interested persons of the Corporation's whistleblower protection policy by an orientation, notices in print and online media, and the dissemination of policy and procedures.