

## **WHISTLEBLOWER POLICY**

Mission of Hope Bolivia directors, officers and team members practice high standards of business, ethical, and legal conduct. As a ministry, we are committed to providing a means for team members to raise concerns about suspected illegal, fraudulent, or unethical behavior and ensure that they are protected from retaliation for whistleblowing in good faith. The Whistleblower Policy is intended to encourage and enable team members and others to raise serious concerns internally so that CAM can address and correct any potentially illegal or financial misconduct and actions.

**Definition of Terms:** For purposes of this policy, the definition of “illegal, fraudulent, or unethical” includes but is not limited to:

- Theft or other misappropriation of ministry assets
- Misstatements or other irregularities in ministry records
- Incorrect financial reporting
- Misuse of ministry resources
- Illegal activities
- Forgery or alteration of documents
- Any other form of fraud

### **Reporting**

Mission of Hope Bolivia wants to hear of suspected problems in these areas so they may be resolved as quickly as possible. Team members who have a concern relating to suspected illegal, fraudulent, or unethical behavior should put the concern in writing to Human Resources. However, if the issue is related to Human Resources, team members should speak directly to the President/CEO or the MOHB Board of Directors. If the resolution is unsatisfactory, report the complaint or concern to MOHB's Whistleblower Advocate, the Board Chair, by emailing [CAMWhistleBlower@protonmail.com](mailto:CAMWhistleBlower@protonmail.com).

### **Investigating the Concern**

The Whistleblower Advocate(s) will investigate each matter reported and take corrective and disciplinary actions where appropriate.

The Whistleblower Advocate(s) may enlist team members of Mission of Hope Bolivia and/or outside legal, accounting, or other advisors, as appropriate, to investigate suspected illegal, fraudulent, or unethical conduct or activities. The Whistleblower Advocate(s) will make every effort to protect the confidentiality and anonymity of the person raising the concern. The Whistleblower Advocate(s) will contact the complainant if additional information is needed.

The Whistleblower Advocate(s) will advise Human Resources of all complaints and their resolution in a timely manner.

### **Document Retention**

The Whistleblower Advocate(s) is/are required to retain documentation of any complaints or concerns for at least seven years.

**No Retaliation**

A director, officer, team member or other person who reports a violation in good faith will be protected from harassment, retaliation, or adverse employment status changes.

Those who violate this protection may be subject to discipline, up to and including termination of employment.

Additionally, no director, officer or team member shall be adversely affected because they refuse to carry out a directive which, in fact, constitutes fraud or violates state or federal law.

**Acting in Good Faith**

Anyone filing a complaint must be acting in good faith and have reasonable grounds for believing the information disclosed indicates illegal, fraudulent, or unethical behavior.

Any unsubstantiated claims that are knowingly false or made maliciously may lead to disciplinary action, up to and including termination. If a complaint is investigated and it is determined to be baseless or becomes corrected, the complainant must concede or be subject to appropriate disciplinary action, up to termination of employment.