



Policy Title: Whistleblower Policy			
Policy Number:	TBD	Original SLT Approval Date: Dec. 1, 2015	Effective: January 1, 2019
Date last revisions:	January 16, 2019	Operational Area:	Organization-wide
Title of Executive Sponsor:	Chief Operating Officer		
Date of Board Approval:	September 23, 2019		

Policy Objective: To foster a high-performing culture that maintains the highest standards of honesty, ethical behavior, openness, accountability and transparency in communications, consistent with NetHope’s foundational principles of humanity, collaboration and mutual respect.

1. Purpose and Objectives

NetHope Inc. (“NetHope”) requires all employees, officers, directors, volunteers and consultants (“Staff”) to observe high standards of business and personal ethics in the conduct of their duties and responsibilities, and to comply with all applicable laws and regulatory requirements. This Policy outlines the process for reporting good faith concerns about the legality or propriety of actions or reasonably-anticipated actions by any Staff without fear of retaliation.

The following is a non-exhaustive list of the types of improprieties that should be reported under this Policy:

- a) A violation of law, rule, or regulation,
- b) Gross mismanagement or abuse of authority,
- c) Misuse or waste of any NetHope or donor funds, or
- d) A substantial and specific danger to public health or safety.

The objectives of the Organization's Whistleblower Policy are to establish policies and procedures for:

- A. The submission of concerns by Staff on a confidential and anonymous basis.
- B. The receipt, retention, and treatment of complaints received by the Organization regarding accounting, internal controls, or auditing matters.
- C. The protection of Staff reporting concerns from retaliatory actions.

2. Requirement of Good Faith

Anyone filing a complaint must be acting in good faith and have reasonable grounds for the basis of such complaint. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

3. Confidentiality

Complaints may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of complaints will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

NetHope encourages any Staff reporting under this Policy to identify himself or herself when making a report in order to facilitate the investigation of the underlying matter. However, reports may be submitted anonymously by either (i) communicating in writing via US mail to the CEO of NetHope, PO Box 95586, Seattle, Washington 98145, or (ii) communicating via electronic mail to [whistleblowersubmission@nethope.org]. The CEO will have exclusive access to the email account.

4. Complaint Procedures

All complaints should be reported to NetHope's Chief Executive Officer (the "CEO").

A. Handling of Reported Violations

If the complainant's identity is disclosed, the CEO will acknowledge receipt of the complaint in writing (including via e-mail) to the complainant promptly but in any event within five business days. All reports will be promptly investigated and appropriate corrective action will be taken as warranted.

If the complaint is against the CEO, then the complainant may escalate to the Chair of the Board of Directors (the "Chair") via electronic mail to [executivewhistleblowersubmission@nethope.org]. The Chair will make a determination whether to outsource the investigation to an outside firm to ensure fairness and impartiality.

If the complaint is against the Chair, then the complainant may escalate to either Vice Chair of the Board of Directors (the "Vice Chair") via electronic mail to

[executivewhistleblowersubmission@nethope.org]. The Vice Chair will, in consultation with the other Vice Chair, make a determination whether to outsource the investigation to an outside firm to ensure fairness and impartiality.

B. Reporting Responsibility

Staff has an obligation to report in accordance with this Whistleblower Policy as soon as reasonably practicable, but in any event 90 days, of discovering the violation.

C. Protection from Retaliation

This Whistleblower Policy is intended to encourage and enable Staff to raise concerns within the Organization for investigation and appropriate action. With this goal in mind, Staff who, in good faith, reports a concern will not be subject to retaliation or, in the case of an employee, adverse employment consequences related to whistleblower complaints. Moreover, any Staff member who retaliates against someone who has reported a concern in good faith is subject to discipline up to and including termination of employment.

5. Distribution and Annual Training

A copy of this Policy will be distributed to all Staff and made available through the Organization's internal [website/intranet]. In addition, NetHope will provide mandatory refresher training to Staff of this Whistleblower Policy on an annual basis.

6 Policy Oversight/Reporting

NetHope's Board of Directors is ultimately responsible for providing oversight of the implementation of, and compliance with, this Whistleblower Policy.

The CEO will maintain a written record of all submitted complaints, summarizing in reasonable detail the nature of the concern, the date submitted, the steps undertaken and final resolution, and will provide updates to the Chair as requested. The Chair and Vice Chairs will maintain a similar record of complaints submitted directly to him/her, if any. The CEO (and Chair/Vice-Chairs, as applicable) will report to the full Board of Directors at least twice annually regarding the nature of all whistleblower complaints during the prior period. Such periodic reporting will not require disclosure of specific facts but rather is intended to provide the Board of Directors with visibility into the frequency and general nature of such complaints.

The Board reserves the right to amend and/or supplement this Policy at any time.