

ICNA Relief USA Whistleblower Policy

Policy

Purpose ICNA Relief is committed to maintaining the highest standards of conduct and ethical behavior. This policy establishes procedures for the reporting and investigation of misconduct, illegal activities, or violations of organizational policies. It helps to protect individuals who report suspected violation of laws, regulations or organizational policies. The policy also ensures that allegations are investigated promptly and fairly.

Scope This policy applies to all employees, volunteers, board members, and contractors of ICNA Relief.

○ Contact information:

■ Whistleblower Protection Officer: wpo@icnarelief.org

■ Executive Director: ceo@icnarelief.org

■ Board Chair: marif@icna.org

1. Reporting Responsibility

○ It is the responsibility of all employees, volunteers, board members, and contractors to report any fraud, corruption, safety violations and the concerns regarding violations of laws, regulations, policies, or ethical standards.

2. Reporting Procedure

○ Concerns should be reported in writing to the Whistleblower Protection Officer (**WPO**). If the concern involves the WPO, reports may be made to the Executive Director or the Board Chair.

○ **Within the boundary of this policy, a limited variation in Reporting or Handling the incident may be applied due to local situation yet consistent with the intent of this stated policy. Such variation must be pre-approved in writing by the IR WPO and IR CEO.**

3. Confidentiality

○ *An individual may report a suspected violation anonymously or on a confidential basis,*

keeping in mind that in the course of the investigation it may become necessary that the source of the complaint be identified.

4. Non-Retribution

○ No employee, volunteer, board member, or contractor who in good faith reports a concern shall suffer harassment, retaliation, or adverse employment consequences. Anyone who retaliates against someone who has reported a concern in good faith is subject to discipline, up to and including termination of employment, contract, membership or volunteer status.

5. Investigation

- The WPO will acknowledge receipt of the reported violation or suspected violation within 5 business days.
- All reports will be ***promptly*** and impartially investigated, and appropriate corrective action in consultation, *with the Subject Matter Expert-SME (e.g., Attorney, Security personnel, Financial, HR)* will be taken if warranted by the investigation.

6. Acting in Good Faith

○ Anyone filing a complaint concerning a violation or suspected violation must act in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove to be unfounded and were made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

7. Documentation

○ The WPO shall maintain a log of all reported concerns, including dates of receipt, nature of the concern, and the outcome of the investigation, and shall prepare a periodic summary report for the Board of Directors.

Approval and Effective Date

This policy was approved by the Board of Directors on 7th December 2024 and is effective as of its approval date.

Review and Amendments

This policy will be reviewed annually and updated as necessary.

Acknowledgment

All existing employees, new employees, volunteers, board members, and contractors

are required to visit the ICNA Relief website (<https://icnarelief.org>), read and understand all published policies, including this one, and other procedures. This will be an implied and binding agreement for such policies and becomes part of their engagement with the ICNA Relief.

History

Version	Description	Authors(s)	Date
0.1	Initial Draft Policy	Chair IR Board	8/11/2024
0.2	Amended Draft presented to Board	IR EAC Committee	10/27/2024
1.0	Policy Approved	ICNA Relief Board	12/7/2024