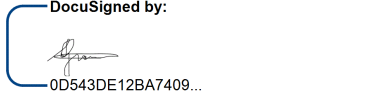


<b>Policy Name</b>	Investigation Policy	<b>Version #</b>	1.1
<b>Owner</b>	Chief Compliance Officer	<b>Number of pages</b>	4
<b>Approver</b>	Chief Compliance Officer	<b>Effective date</b>	7-Jan-2022
<b>Business Unit</b>	Compliance	<b>Date of previous version</b>	11-Jul-2019
<b>Signature</b>		<b>Date of last review</b>	7-Jan-2022
		<b>Date for next review</b>	1-Jan-2024

## I. Purpose

Pathfinder International, its subsidiaries and affiliates (“Pathfinder”) are committed to the highest standards of ethical and legal business conduct. To meet this standard, an investigation should be conducted if there is a credible report of actual or suspected misconduct as defined in the *Reporting and Whistleblower Protection Policy* (“*Reporting Policy*”). This *Investigation Policy* establishes the framework and principles for investigating misconduct reports. The purpose of an investigation is to establish the relevant facts to determine whether or not those facts constitute misconduct.

## II. Applicability

This policy applies to investigations involving the board of directors, officers, employees, volunteers, independent contractors, consultants, subawardees, and anyone acting on behalf of Pathfinder (“Pathfinder representatives”). The requirements for investigations conducted under this policy apply to reports of suspected misconduct as defined in the *Reporting Policy*, which includes violations of laws and regulations, Pathfinder policies, donor requirements, and ethical standards.

## III. Policy Statement

All reports of suspected misconduct must be reviewed in a timely manner. If the review indicates that the complaint is credible and that there is reasonable basis to conduct further inquiry, a thorough investigation should be promptly initiated. However, no investigation should be conducted if a review establishes that the complaint: is frivolous, cannot be credibly investigated,<sup>1</sup> has already been resolved, or fails to allege misconduct as described in the *Reporting Policy*. After a review is conducted, the *Misconduct Register* must be updated to reflect the results of the review, including whether an investigation is being conducted.

---

<sup>1</sup> For instance, it may not be possible to conduct a credible investigation if a report of misconduct was made anonymously, the reporter is the only person with relevant evidence, and the anonymous person cannot be contacted to further the investigation.

### III-1. Assigning an Investigator

Reports will be investigated by or under the supervision of a Local Compliance Officer; a member of Global Compliance, Human Resources, Finance, or Internal Audit; the Chief Legal Officer; or another qualified person with relevant expertise. Investigations may also involve the use of outside legal counsel or appropriate external resources. Investigator assignments should be in accordance with the following principles:

- No person may conduct or supervise an investigation of an allegation relating to their own actions;
- No person may conduct an investigation relating to the actions of a person in their line of management (*for example*, someone they report to or who reports to them), except as determined necessary and appropriate by the Chief Legal Officer;
- The person who made the report must not conduct their own investigation unless officially designated to do so by the Local Compliance Officer; and
- An individual may not investigate the report if they have a personal interest in the misconduct (*for example*, a personal relationship with any persons alleged to be involved or a financial interest in the results of the investigation).

### III-2. Conducting Investigations

All investigations will be conducted in accordance with applicable US and local laws. If there is a conflict between US and local law, the LCO and/or investigator should closely consult with the Compliance Director or the Chief Legal Officer on how to resolve any conflict.

Investigations must be conducted in a confidential, impartial, and objective manner. Persons not directly involved will be informed of an investigation only on a need-to-know basis. Pathfinder representatives who are interviewed or otherwise contacted as part of an investigation are required to maintain its confidential status and may not discuss it with others inside or outside Pathfinder (this is not intended to prohibit any person from reporting misconduct that they are aware of to the US Government or other authorities as permitted by law). The person conducting an investigation will document each step, including evidence reviewed and witnesses interviewed, in addition to stating the finding(s) in writing.

**As set forth in the “Whistleblower Protections” section of the *Reporting Policy*, persons who report actual or suspected misconduct or who provide information as part of an investigation are protected against retaliation.**

When an investigation establishes that the relevant facts support a finding of misconduct, a report will be submitted to the person(s) responsible for determining corrective action, including disciplinary action where appropriate. If an investigation establishes that the report was made in bad faith, the individual who made the report may be recommended for disciplinary action. Results of investigations will also be reported to the US Government and other authorities as required by law, and to donors and others as appropriate.

The person making a report will be informed when an investigation is initiated or the reason why an investigation was determined not to be required. Following an investigation, the reporter will be informed whether misconduct was determined to have taken place and whether corrective action

was taken as a result. Details of the investigation and any corrective action will not be disclosed to the reporter.

## IV. Responsibilities

The Compliance Director is responsible for developing investigation guidelines consistent with the principles set forth in this policy. The Compliance Director is responsible for oversight of investigations to ensure compliance with this policy and any related procedures, including by reviewing the assignment of investigators; the conduct of investigations; as well as the documentation of investigation results.

Any person who receives a report of actual or suspected misconduct is responsible for reporting the incident to the Local Compliance Officer or to Global Compliance.

Local Compliance Officers must immediately inform Global Compliance if they receive one of the following misconduct reports:

- any matter described in the *Board Reporting Policy*;
- a suspected violation of a US law that applies to conduct outside the United States;
- any suspected misconduct involving USG- or DFID-funded projects; and
- any other matter as required by the Compliance Director.

The designated investigator is responsible to conduct an investigation in compliance with this policy, Pathfinder's *Investigation Guidelines*, and local law. After establishing the relevant facts, the investigator is responsible to document the findings in the *Investigation Process Form* (or other appropriate document depending on the depth and breadth of the review and/or investigation), to consult with the appropriate business unit or the Chief Legal Officer to determine if the facts constitute misconduct, and to submit the investigative findings to the Compliance Officer assigned to track the report. The investigator is required to consult with the Chief Legal Officer if the investigation uncovers any previously undisclosed non-routine legal matter as described in the *Policy for Retaining and Using Legal Counsel and Consulting with the Chief Legal Officer*. Non-routine legal matters include lawsuits, arbitrations, notices of violation, adverse findings, or similar claims brought or threatened against Pathfinder.

All Pathfinder employees and representatives are responsible for respecting the principles set forth in this policy and for cooperating with investigations conducted under this policy, including providing unrestricted access to Pathfinder International premises, facilities, records, and documentary materials, such as photographs, audio and video records, or electronically stored information (ESI). The investigator or their delegate may access materials owned by Pathfinder without the prior knowledge or consent of the Pathfinder representative who has use, custody, or control of the materials. If a litigation hold is issued, "custodians" of relevant data will be notified and will be responsible to ensure ESI and paper documents that may be relevant to the pending litigation are retained and not deleted or altered.

Refusing to cooperate, or providing false, misleading, or incomplete information as part of an investigation, are grounds for disciplinary action, up to and including termination.

## V. References

Reporting and Whistleblower Protection Policy

Tracking Register for Reported Misconduct and Requests for Guidance

Board Reporting Policy

Investigation Guidelines

Investigation Process Form

Policy for Retaining and Using Legal Counsel and Consulting with the Chief Legal Officer

## VI. Change Log

<b>Topic</b>	<b>Version</b>	<b>Section</b>	<b>Change</b>
Policy Framework	1.1	All	Updated to align with Policy Framework and current organizational structure