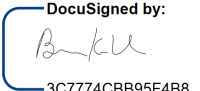




Reporting and Whistleblower Protection Policy	Version #: 2.1
Owner: Executive Director of Compliance	Number of pages: 5
Approver: Chief Legal Officer	Effective date: 24-Nov-2020
Business Unit: Compliance	Date of previous version: 3-Jun-2019
Signature: 	Date of last review: 24-Nov-2020
	Date for next review: 1-Jun-2022

I. Purpose

Pathfinder International, its subsidiaries and affiliates (“Pathfinder”) are committed to the highest standards of ethical and legal business conduct. Anyone who works for, represents, or acts on behalf of Pathfinder has an obligation to report suspected misconduct to ensure that these standards are met. This policy sets forth the requirements and processes for reporting actual or suspected misconduct, and the safeguards that protect individuals from retaliation for making a report.

II. Applicability

This policy applies to the board of directors, officers, employees, volunteers, independent contractors, consultants, sub-awardees, and anyone acting on behalf of Pathfinder (“Pathfinder representatives”). Whistleblower protections under this policy apply to any person who has in good faith made a report of actual or suspected misconduct and cannot be waived by any agreement, policy, form, or condition of employment.

“Misconduct” means violations of laws, regulations, or rules; Pathfinder policies; donor requirements; or ethical standards. For example, misconduct includes (but is not limited to) illegal activity, fraud, theft, gross waste or mismanagement of funds, incorrect financial reports, violations of donor agreements, abuse of authority, sexual harassment, discrimination or abuse, substantial and specific danger to public health or safety, and unreported conflicts of interest. This policy applies to actual or suspected misconduct by Pathfinder, Pathfinder representatives, or third parties doing business with Pathfinder.

III. Policy Statement and Responsibility

You must report any actual or suspected misconduct by Pathfinder, a Pathfinder representative, or a third party doing business with Pathfinder. It is your responsibility to seek guidance and raise concerns when you become aware of potential instances of misconduct. Failure to report misconduct may result in disciplinary action against you, up to and including termination. If you are uncertain about whether a particular action constitutes misconduct, seek guidance from the Local Compliance Officer for your country office or Global Compliance.

You should make a report as soon as reasonably possible after becoming aware of actual or suspected misconduct. Do not conduct your own investigation, whether before, during, or after making a report. It is not up to you to prove that misconduct has taken place.

Reports must be made in good faith. This simply means that you have a reasonable basis for believing that what you are reporting is true. For example, making a false accusation to harm a co-worker is not acting in good faith. Anyone making a report in bad faith is subject to disciplinary action, up to and including termination.

You will be protected from retaliation and any other adverse action for making a good-faith report as described in the “Whistleblower Protections” section below.

IV. Reporting Channels and Procedure

Anyone, including individuals who are not affiliated with Pathfinder, can make a report through any of the following channels:

- *Management* – supervisor, or anyone more senior in your line of management, up through your Country Director, Project Director, or Business Unit Director;
- *Senior Management* – any Chief Officer (for example, the Chief Legal Officer or the Chief Financial Officer);
- *Compliance* – Global Compliance (by email to compliance@pathfinder.org) or your Local Compliance Officer;
- *Human Resources* – any global or local member of the Human Resources Business Unit (employment-related issues should be directed to HR whenever possible);
- *Internal Audit* – the Internal Audit Director;
- *Board of Directors* – the Chair of the Audit Committee, by email to auditcommittee@pathfinder.org;
- *WhatsApp message* – to Global Compliance at +1-617-972-1316;
- *EthicsPoint* – the hotline (online or telephone access) is available at www.pathfinder.org/ethics.

Additional reporting options, such as an internal committee for sexual harassment complaints, may be available if required by your country’s laws.

IV-1. Confidentiality

All reports will be handled confidentially. Pathfinder encourages you to provide your name and contact information when making a report so that we can directly contact you for additional information as appropriate. It is often helpful to have a confidential discussion with the reporting person to conduct a thorough investigation. The name of the reporting person, if provided, will be kept confidential and will only be disclosed to the extent needed to conduct the investigation.

IV-2. Reporting through EthicsPoint for External Parties and Anonymous Reports

EthicsPoint is a reporting channel that is managed by an independent company (a third-party vendor). The EthicsPoint reporting channel (www.pathfinder.org/ethics) is accessible to anyone, including individuals who are not currently affiliated with Pathfinder. When you report actual or suspected misconduct using EthicsPoint, you can choose to identify yourself or to make the report anonymously. You can make the report online or obtain a local telephone number to call in the report. The information needed to make a local telephone call in each Pathfinder country is listed on the poster in each Pathfinder office, in the Appendix to this policy, and on the EthicsPoint website. When you access www.pathfinder.org/ethics, you will be given the choice of language in which to communicate your report.

If you prefer to be anonymous: you can make a report of actual or suspected misconduct without identifying yourself on EthicsPoint. When you make the report, you will be asked if you wish to remain anonymous; at that point, you can choose whether to provide your name or contact information. Whether or not you choose to remain anonymous, you will be provided a unique case number and password to access your report on EthicsPoint. You are encouraged to check in on your report to monitor the progress and provide additional information if needed. This system also allows Pathfinder to ask follow-up questions while protecting your anonymity.

IV-3. What Happens After the Report of Misconduct is Received?

Pathfinder will respond to reports of misconduct based on the nature of the concern and as appropriate given available information. Initial inquiries may be conducted to determine whether an investigation is appropriate and how the investigation should be handled, including whether a law firm or other external party should be retained to assist in an investigation. Depending on the nature of the issue and the information provided in the initial report, further information may be sought from or provided to the person reporting the concern. Anonymous reports will be investigated appropriately, based on the seriousness of the issue, the credibility of the concern, and the likelihood of confirming the allegation through identifiable sources.

Any individual who receives a report of actual or suspected misconduct is responsible to report the incident to the Local Compliance Officer for the country **or** to Global Compliance. The Compliance Officer who receives the report is responsible to document it in the *Reported Misconduct Tracking Register*. The Compliance Officer must consult with the Pathfinder *Investigation Policy* (or the Global Compliance Director) to determine who is responsible for handling and/or investigating the report.

IV-4. Documenting Reports in the Tracking Register

The Compliance Officer must track all actual or suspected misconduct that is reported in the country using the *Reported Misconduct Tracking Register* (see description in the Appendix). The Compliance Officer must send the register of *Reported Misconduct* to the Global Compliance Director on a quarterly basis as outlined in the register. The register should include all reports, including any reports that did not require a full investigation or which were determined to be without merit. Where local law mandates

specific procedures to be followed, such as the management of sexual harassment complaints, local management must work with Global Compliance to confirm and document procedures for the country.

V. Whistleblower Protections

Pathfinder and Pathfinder representatives are prohibited from taking any harmful action with the intent to retaliate against you for:

- **reporting information in good faith that you reasonably believe is evidence of misconduct;**
- **disclosing or giving evidence to a court, agency, law enforcement, or other governmental body;**
- **providing information as part of an investigation; or**
- **seeking guidance under this policy.**

“Harmful action” includes termination, demotion, discrimination, threats, reprisals, and retribution.

As an additional safeguard, all reports will be handled confidentially, and anonymous reports may be made through the EthicsPoint hotline as described in the preceding section.

If you experience retaliation, report it through any of the reporting channels listed above. Anyone who engages in retaliation in violation of this policy will be subject to discipline, up to and including termination.

Protections under this policy are intended to meet or exceed those established by applicable US federal and state laws and regulations, and the laws of your country. In addition, US law provides you with specific rights and remedies if you are retaliated against after making certain disclosures (see 41 USC 4712).

VI. Additional Guidance

If you have any questions regarding this policy, the whistleblower protections, or any legal, ethical, or compliance issues, please consult with your country’s Compliance Officer or Global Compliance.

VII. References

[41 USC 4712: Enhancement of contractor protection from reprisal for disclosure of certain information](#)

Pathfinder International global policies:

Anti-Discrimination and Anti-Harassment Policy

Code of Conduct

Conflict of Interest Policy

Investigation Policy

Workplace Conflict Resolution Policy

*Country-specific Addendum:*Policy for Prohibition, Prevention and Redressal of Sexual Harassment (*Pathfinder India*)

VIII. Change Log

Topic	Version	Section	Change	Notes
Policy Framework	2.1	All	Updated to align with Pathfinder Policy Framework and template	n/a
Donor Reporting	2.1	Appendix II	Added Appendix II. Direct Reporting to Donors.	Former Appendices II and III are now III and IV, respectively.

IX. Appendix

Appendix I. EthicsPoint Contact Numbers

Appendix II. Direct Reporting to Donors

Appendix III. Oversight for Reports of Misconduct

Appendix IV. Description of *Reported Misconduct Tracking Register*

Appendix I. EthicsPoint Contact Numbers

Information for making a **local telephone call** to EthicsPoint in each Pathfinder country is listed below.

Pathfinder Country	Reverse Charge / Collect Calls Contact your local operator and request a “reverse charge” or “collect call” be placed to the United States using the number listed for your country.	International Toll-Free Service Dial the toll-free service number for your location	Direct Dial Dial the access number for your location. At the prompt, dial 855-224-7186
Bangladesh*			
Burkina Faso	503-597-4386		
Burundi	503-597-4386		
Cote d’Ivoire	503-747-1871		
DRC	503-597-4386		
Egypt (Cairo)			2510-0200
Egypt (Cellular)			02-2510-0200
Ethiopia	503-597-4386		
India		000-800-100-1071 <i>or</i> 000-800-001-6112	
Kenya	503-597-4386		
Mozambique	503-597-4386		
Niger	503-597-4386		
Nigeria			0-708-060-1816
Pakistan			00-800-01-001
Peru		0800-52116	
South Africa		080-09-92604	
Tanzania	503-597-4386		
Togo*			
Uganda	503-597-4386		
United States			1-855-224-7186

*Currently, EthicsPoint does not have a reliable telephone service for these countries. Individuals who wish to make an anonymous report from these countries can use the online reporting form at www.pathfinder.org/ethics.

Dialing Instructions for EthicsPoint Telephone Numbers

There will not be an added charge for the call. The only cost to you is whatever your wireless provider charges you to make a call.

- Reverse Charge Calls / Collect Calls
 - From an outside line, contact your local operator.
 - Request a “reverse charge” or “collect call” to the United States using the number listed.
 - The call will be accepted by the Contact Center using an automated English message.
- Direct Dial
 - From an outside line, dial the Direct Dial Access for your location.
 - At the prompt, dial **855-224-7186**.
- International Toll-free Service: From an outside line dial the international toll-free service number for your location.

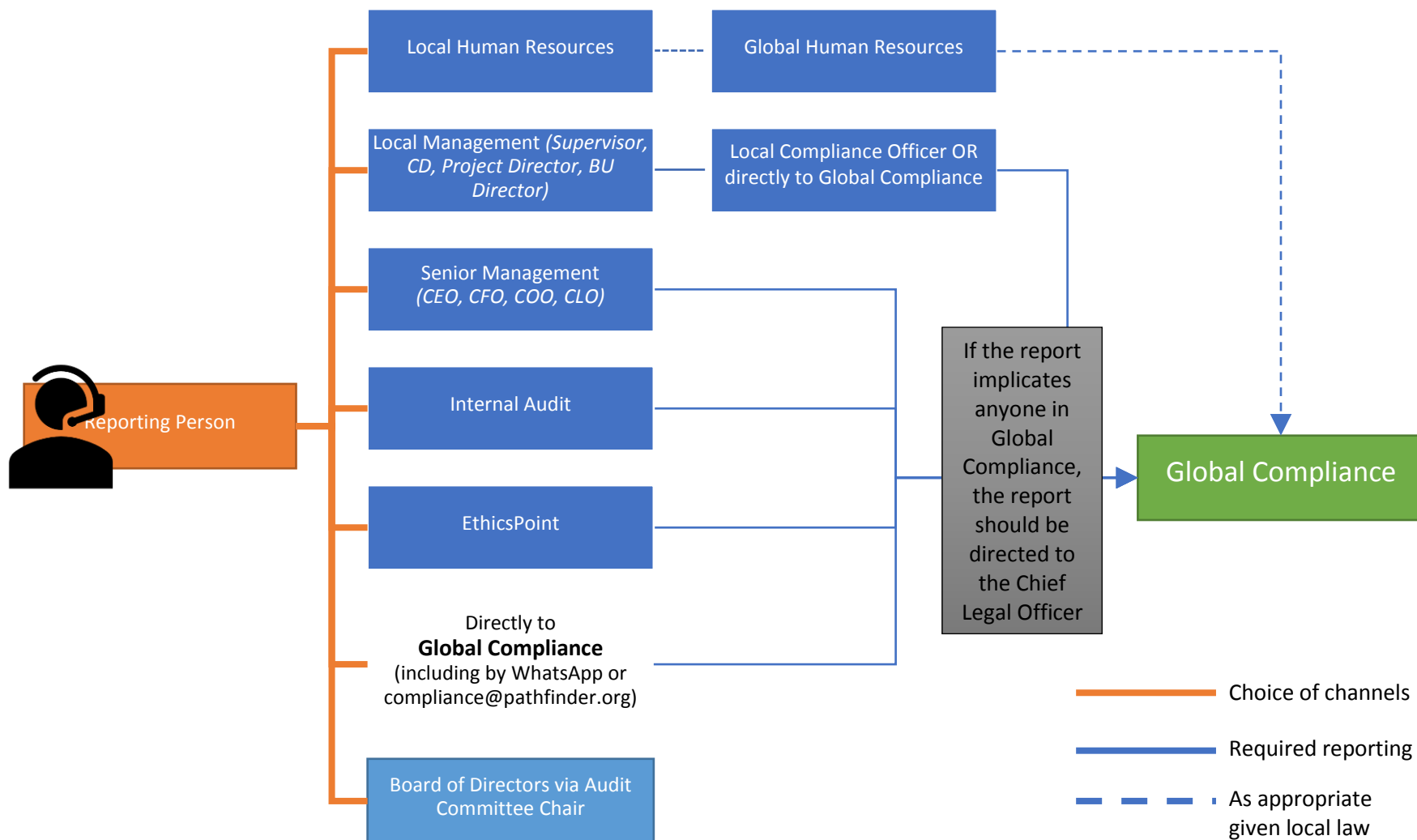
Appendix II. Direct Reporting to Donors

Pathfinder representatives are required to report any actual or suspected misconduct through the reporting channels specified in the *Reporting and Whistleblowing Protection Policy*. The Compliance BU reviews misconduct that is duly reported through internal channels for appropriate reporting to donors as required. To ensure consistency and clarity in reporting, Pathfinder's protocol is for the Chief Legal Officer to disclose alleged misconduct to donors.

Some donors/funders offer additional reporting options which are listed below.

Donor/Funder	Reporting Hotline
Anadarko	Anadarko Hotline Phone: +1.877.781.2434 Website: http://www.anadarko.com/hotline
DFID	Counter Fraud and Whistleblowing Unit (CFWU) Email: reportingconcerns@dfid.gov.uk Phone: +44(0)1355 843747
Global Affairs Canada (GAC)	GAC Email: allegations@international.gc.ca
Government of the Netherlands	Ministry of Foreign Affairs, Integrity Officer Email: integriteit@minbuza.nl
Mannion Daniels Ltd.	Director of Operations or the Compliance Manager Website: https://www.manniondaniels.com/about-manniondaniels/suspected-fraud-and-whistleblowing/
Oak Foundation	Website: https://oakfnd.org/report-fraud-or-abuse/
Packard Foundation	Website: https://secure.ethicspoint.com/domain/media/en/gui/12445/index.html
UNFPA	Director, OAIS Email: investigationshotline@unfpa.org Phone: +1 212 297 5200 Fax: +1 212 297 4938 Mail: 605 Third Avenue, New-York, NY 10158, USA
UNICEF	Director, Office of Internal Audit and Investigation, UNICEF Email: integrity1@unicef.org
USAID/US Government	Office of Inspector General Email: ig.hotline@usaid.gov Phone: +1 8002306539 or +1 2027121023 Fax: +1 202 216 3801 Mail: U.S. Agency for International Development, Office of Inspector General, P.O. Box 657, Washington, DC 20044-0657

Appendix III. Oversight for Reports of Misconduct



Appendix IV. Description of Reported Misconduct Tracking Register

The *Reported Misconduct Tracking Register* is an Excel spreadsheet that will be maintained by each country's Local Compliance Officer and submitted to Global Compliance on a quarterly basis. The information below will be recorded for each report of misconduct. An example of a report is in gray italics below.

No: 1

Date Reported: #####

Location: *Washington, DC Pathfinder office*

Reporting Format: *In person*

Source: *Pat H. Finder*

Relationship to Pathfinder: *Employee*

Concern/Complaint/Allegation: *EXAMPLE -- Email account appears to be sending out messages without her knowledge.*

Potential Impact: *Moderate*

Status: *Closed*

Actions Planned or Taken: *IT Manager suspended account, had user change password twice within 30 mins, scanned for virus. User received new machine and old one was wiped.*

Investigator: *Country IT Manager*

Date Closed: #####

Resolution: *Phishing attempt detected and halted via methods detailed in approach.*

Type of response provided: *Obtain input from SME*

Topic: *IT*

Informed Parties: *Global IT Director*

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P
1	<i>Privileged and Confidential</i>															
2	<i>This register must be sent to the Compliance Director on a quarterly basis with year beginning in March (quarters end May, August, November, February).</i>															
3	<i>Date last sent to Global Compliance:</i>						<i>Next date to send to Global Compliance: 31-May-19</i>									
4	<i>Date Reported</i>	<i>Location</i>	<i>Report Format</i>	<i>Source</i>	<i>Relationship to Pathfinder</i>	<i>Concern/Complaint/Allegation</i>	<i>Potential Impact</i>	<i>Status</i>	<i>Approach</i>	<i>Investigator</i>	<i>Date Closed</i>	<i>Resolution</i>	<i>Type of response provided</i>	<i>Topic</i>	<i>Informed Parties</i>	
5	<i>1-Oct-18</i>	<i>Washington, DC Pathfinder office</i>	<i>In person</i>	<i>Pat H. Finder</i>	<i>Employee</i>	<i>EXAMPLE -- Email account appears to be sending out messages without her knowledge.</i>	<i>Moderate</i>	<i>Closed</i>	<i>IT Manager suspended account, had user change password twice within 30 mins, scanned for virus. User received new machine and old one was wiped.</i>	<i>Country IT Manager</i>	<i>2-Oct-18</i>	<i>Phishing attempt detected and halted via methods detailed in approach.</i>	<i>Obtain input from SME</i>	<i>IT</i>	<i>Global IT Director</i>	