

Whistleblower Policy

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Project Mexico
& St. Innocent Orphanage



Building Hope for Boys Without Families and Families Without Homes

WHISTLEBLOWER POLICY
OF
Project Mexico & St. Innocent Orphanage

INTRODUCTION AND PURPOSE

Project Mexico & St. Innocent Orphanage (the “Corporation”) requires its directors, officers, employees, and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. The purpose of this policy is to encourage and enable employees and volunteers of the Corporation to report any action or suspected action taken within the Corporation that is illegal, fraudulent, or in violation of any adopted policy of the Corporation to a source within the Corporation before turning to outside parties for resolution.

This policy applies to any matter which is related to the Corporation’s business and does not relate to private acts of an individual not connected to the business of the Corporation. This policy is intended to supplement, but not replace, the Corporation’s Code of Conduct policy, any other grievance procedure, or any applicable state and federal laws governing whistleblowing applicable to nonprofit and charitable organizations.

VIOLATIONS; REPORTING IN GOOD FAITH

All employees and volunteers of the Corporation are encouraged to report any action or suspected action taken within the Corporation that is illegal, fraudulent, or in violation of any adopted policy of the Corporation. Anyone reporting a violation must act in good faith, without malice to the Corporation or to any individual in the Corporation, and have reasonable grounds for believing that the information shared in the report indicates that a violation has occurred. Any report which the complainant has made maliciously or any report which the complainant has good reason to believe is false will be viewed as a serious disciplinary offense.

NO RETALIATION

No employee or volunteer who in good faith reports a violation or cooperates in the investigation of a violation shall suffer harassment, retaliation, or adverse employment or volunteer consequences. Any individual within the Corporation who retaliates against another individual who in good faith has reported a violation or has cooperated in the investigation of a violation is subject to discipline, including termination of employment or volunteer status. If an individual believes that someone who has made a report of a violation or who has cooperated in the investigation of a violation is suffering from harassment, retaliation, or other adverse employment or volunteer consequences, the individual should contact the Executive Director immediately.

Any individual who reasonably believes he or she has been retaliated against in violation of this policy shall follow the same procedures as for filing a complaint.

REPORTING PROCESS

If an individual reasonably believes that a violation has occurred, the individual is encouraged to share his or her questions, concerns, suggestions, or complaints with any person within the Corporation who may be able to address them properly. In most cases, the direct supervisor of the individual is the person best suited to address a concern. However, if an individual is not comfortable speaking with his or her supervisor or if he or she is not satisfied with the supervisor's response, the individual is encouraged to speak directly to the Executive Director.

CONFIDENTIALITY

The Corporation encourages anyone reporting a violation to identify himself or herself when making a report in order to facilitate the investigation of the violation. However, reports may be submitted on a confidential basis by the complainant or may be submitted anonymously via a submitted, written document that thoroughly explains the nature of the violation, the individuals involved, and all supporting evidence of the violation. The document should be sealed in an envelope with nothing written on the outside and deposited in the drop box outside the Executive Director's office.

Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation, to comply with all applicable laws, and to cooperate with law enforcement authorities. Furthermore, the Corporation will explore anonymous allegations to the extent possible but will weigh the prudence of continuing such investigations against the likelihood of confirming the alleged facts or circumstances from attributable sources.

COMPLIANCE OFFICER; HANDLING REPORTED VIOLATIONS

The supervisor or manager who receives a report of a violation from the complainant is required to notify the Executive Director of that report. The Executive Director will notify the complainant and acknowledge receipt of a report of violation within five business days to the extent that the complainant's identity is disclosed or a return address is provided.

The Executive Director is responsible for promptly investigating all reported violations and for taking appropriate corrective action warranted by the investigation. The complainant will be notified about what actions will be taken to the extent reasonably possible and consistent with any privacy or confidentiality limitations. If no further action or investigation is to follow, an explanation for the decision will be given to the complainant.