

# GLOBAL WHISTLEBLOWER POLICY

Policy Author: General Counsel

Policy Owner: Office of General  
Counsel

Scope/Eligibility: All Employees and Volunteers

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Questions? Contact: [legal@ijm.org](mailto:legal@ijm.org) or your Regional Counsel

## Section 1: Framing

### Purpose

- Emphasize the seriousness of IJM's commitment to legal and ethical compliance and support IJM's compliance efforts.
- Provide a clear procedure for addressing incidents of illegal, unethical or dishonest behavior.

### Approach

IJM is committed to the highest ethical standards, not merely as a matter of complying with the law, but as an expression of our IJM identity. IJM takes seriously any violation of these standards and encourages and appreciates employee efforts to help uphold these standards by reporting any illegal, unethical or dishonest behavior within the organization of which an employee is aware. Unlike IJM's normal conflict resolution practices, employees who are aware of such illegal, unethical, or dishonest behavior do not need to first confront the person alleged to have committed the infraction but should immediately report it as described in this policy.

### Context and Authority of Policy

Board Policy Manual Section 4.5.3; legal requirements vary by jurisdiction; often required by institutional funders.

## Section 2: The Global Policy

### Global Policy Statement #1: Definition of Whistleblower

A "Whistleblower" is an IJM Employee or volunteer (which includes officers, board member, interns, and fellows) who in good faith reports pursuant to this policy any activity within IJM that he or she reasonably believes to be illegal, unethical or dishonest. Others, including partners, recipients of IJM services, contractors, and members of the general public, are also encouraged to report concerns pursuant to the process described in this policy.

*For Example:* This covers any kind of legal violation; theft; fraudulent financial reporting; intentional misrepresentation of facts to donors or other constituents; undisclosed conflicts of interest; violation of ethics policies such as IJM's [Safeguarding](#), or [Bribery](#) Policies; or other significant policy violations.

### Global Policy Statement #2: Intent to Comply with The Law

While the applicable law and application of ethical standards will vary depending on the location, it is the intent of IJM, including all IJM offices, Employees, contractors, officers, board members and volunteers worldwide, to adhere to all applicable laws and the highest ethical standards.

### Global Policy Statement #3: Reporting Illegal, Unethical, or Dishonest Behavior

If you reasonably believe that some policy, practice, or activity of IJM is illegal or unethical, or reasonably believe that any IJM employee, board member, officer, or volunteer, or any person acting in IJM's name or authority, is engaging in illegal, unethical or dishonest behavior, you must immediately report it following the procedures outlined in Section 3.

Whistleblowers must exercise reasonable judgment to avoid baseless allegations. All reports must be made in good faith. A person who intentionally files a false report will be subject to discipline, which may include termination. However, you are not responsible for interpreting the meaning of facts you report or determining whether the facts as you allege constitute illegal or unethical behavior. If you are unsure what constitutes illegal or unethical behavior, you may report the facts as you understand them.

### Global Policy Statement #4: Internal Investigations

IJM will address all complaints or allegations of misconduct pursuant to IJM's [Global Complaints Management/Internal Investigations Policy](#). Whistleblowers should not attempt to independently investigate claims or concerns, either before or after reporting.

### Global Policy Statement #5: Freedom from Retaliation

IJM prohibits, and will not tolerate, retaliation against a Whistleblower who in good faith reports activity within IJM that he or she reasonably believes to be illegal, unethical, or dishonest through any of the channels listed in Section 2 for reporting the activity. Further, when such Whistleblower provides IJM a reasonable opportunity to investigate and correct the alleged activity, IJM will not retaliate against the Whistleblower for:

- Protesting or complaining about some practice of IJM or of an individual or entity connected to IJM the Whistleblower reasonably believes is illegal or unethical; or
- Disclosing or threatening to disclose publicly any activity, policy, or practice of IJM or of an individual or entity connected to IJM that the Whistleblower reasonably believes is illegal or unethical.

A Whistleblower's right to freedom from retaliation does not include immunity from investigations of personal wrongdoing or measures taken to address performance issues.

### Global Policy Statement #6: Confidentiality and Anonymity

Anonymous reports are permitted. Reporters have the right to remain anonymous, but refusal to disclose details, including the identity of the reporter, may inhibit IJM's ability to fully investigate and respond to the allegations.

IJM will, to the maximum extent feasible, maintain confidential Whistleblowers' identity. However, IJM may need to disclose a Whistleblower's identity in order to sufficiently conduct a thorough investigation, comply

with the law and/or to provide accused individuals their legal right of defense. In such case, IJM will first notify the Whistleblower.

## Decisions & Authority

Decision	Recommend	Agree	Perform	Input	Decide
Making changes to the policy	CFO; CPO		OGC	Regional Counsel; other key stakeholders; Any person, by emailing legal@ijm.org	OGC
Reporting any activity or action by IJM or someone acting with IJM's authority that you reasonably believe to be illegal, unethical, or dishonest			Any IJM Employee or Volunteer  Others may also report		N/A
Investigating Whistleblower Reports			Typically OGC, unless delegated; plan developed pursuant to Internal Investigations Policy		If the report involves the GC or the CEO, the Chair of the FAA Committee shall develop a plan for addressing and investigating the allegations, in consultation with outside counsel, as appropriate.
Evaluating meaning of facts as reported and/or investigated, including what constitutes illegal or unethical behavior or policy violation			OGC	Outside Counsel	OGC  If the report involves the GC or the CEO, the Chair of the FAA Committee shall develop a plan for addressing and investigating the allegations, in consultation with outside counsel, as appropriate.
Determine and apply corrective measures	OGC		Manager	Outside Counsel	Typically, Manager and HR lead decide in consultation

## Definitions & Terms

### FOR REFERENCE

- **[Common definitions](#)**: Common terms related to on governance or frequently used IJM terms.
- **[IJM's global glossary of terms](#)**: IJM's full global glossary of terms.

Term	Description	Example
Whistleblower	An IJM employee, officer, board member, or volunteer who in good faith reports pursuant to this policy any activity within IJM that he or she reasonably believes to be illegal, unethical, or dishonest.	<p>IJM Staff Maria observes an interaction where a senior staff seems to abuse his authority to get personal favors from a younger staff. She reports it by emailing <a href="mailto:legal@ijm.org">legal@ijm.org</a></p> <p>A volunteer on a trip to the field sees an IJM staff member interact with vulnerable people in contravention of the Safeguarding Code of Conduct. He submits his concern <a href="#">IJM's reporting form</a>.</p> <p>IJM Staff John is concerned a practice violates labor laws in his country. He raises with the Country Director but is brushed off. He reports it to his Regional Counsel.</p>

## Section 3: Global Processes & Resources

### Global Procedures

- Any report can be made to the Office of the General Counsel directly to a Regional Counsel, or via our legal inbox, [legal@ijm.org](mailto:legal@ijm.org).
- Anonymous reports may be made via IJM's [confidential reporting form](#), which allows anyone to report allegations or concerns. Reporters have the right to remain anonymous, but refusal to disclose details, including the identity of the reporter, may inhibit IJM's ability to fully investigate and respond to the allegations.
- The following table provides options to provide reporting avenues that feel safe and comfortable, in recognition of the fact that it can be scary or intimidating to speak up, even with a policy of non-retaliation. As stated in the policy, all reports must be made in good faith.

Reporter	Subject of Report	Procedure
Any person covered by this policy	Any matter	Options for Reporting (any of the below): <ol style="list-style-type: none"> <li>Office of General Counsel: Regional Counsel or <a href="mailto:legal@ijm.org">legal@ijm.org</a></li> <li>Talk to supervisor/manager</li> <li>Talk to HR representative (local or regional HR staff)</li> <li>Report via <a href="#">confidential reporting form</a></li> </ol>
Any person covered by this policy	Reporter's Supervisor/Manager	Options for Reporting (any of the below): <ol style="list-style-type: none"> <li>Office of General Counsel: Regional Counsel or <a href="mailto:legal@ijm.org">legal@ijm.org</a></li> <li>Local office leader or Division leader</li> <li>Local or regional HR staff or IJM's Chief People Officer</li> <li>If a financial matter: local or regional finance staff or IJM's CFO</li> <li>Report via <a href="#">confidential reporting form</a></li> </ol>
Manager or other leader who receives report under this policy	Any matter	Office of General Counsel: Regional Counsel, General Counsel or <a href="mailto:legal@ijm.org">legal@ijm.org</a>

Any person covered by this policy	CEO or Office of the General Counsel (including failure to take action regarding reported misconduct)	IJM Global Board, by contacting the Chair of the FAA Committee at <a href="mailto:FAAChair@ijm.org">FAAChair@ijm.org</a> .
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## Related Governing Documents

- [Global Anti-Harassment and Nondiscrimination](#)
- [Global Bribery, Extortion, and Improper Dealings](#)
- [Global Complaints Management/Internal Investigations Policy](#)
- [Global Safeguarding Policy](#)

## Training

- [SharePoint Announcement Page](#)
- Video introduction ([English](#), [Spanish](#))

## FAQs

Question	Answer
What happens when the incident report system and whistleblower policy overlap? What if, for example, an incident is caused by an IJM staff member or agent engaging in misconduct?	IJM treats incidents that may overlap with the whistleblower policy as a “Sensitive Incident” Report. In such cases, send the incident report directly to your global or regional security office, rather than the incident distribution list ( <a href="mailto:incidentreport@ijm.org">incidentreport@ijm.org</a> ). Please contact Global Security if you have any other questions on this issue.
A lot of this policy seems to rely on telling something to your manager. What is the manager’s responsibility? Are managers required to document the interaction, and how, if so? What if a manager leaves or ignores the communication – how is the employee protected at a later date? For example, say there is an inquiry six months after an incident. An employee says, “I reported this to my manager.” But the manager is gone. Could the employee be held responsible for the misconduct, or for violating this policy, with no documentation about having made a report?	Under the whistleblower policy, the employee can report to their manager or the OGC. If the employee believes they are not getting a response from the first person they report to, they can go to an alternate POCs listed in this policy. All IJM leaders who receive a report of whistleblowing are required under the policy to raise that report with the OGC, who has a duty to investigate. Managers will be receiving training on their obligations with respect to receiving and reporting whistleblowing complaints.
Let’s say I am a local office finance manager. I detect an employee has forged a receipt. I report to the local office leader. The employee admits guilt. How should this be reported to HQ? Who at HQ needs to receive reports like this? Is this a whistleblower issue?	The local office leader will report to their Global Finance & Accounting Team PoC, who will pass this information along to the Controller and OGC as necessary. The Global Finance & Accounting Team is currently developing a policy for reporting financial fraud. In the alternative, if you feel appropriate action is not being taken, you can make a whistleblower report, as detailed in the whistleblower policy.

What is the mechanism for reporting misconduct directly to the Board? When is that appropriate?	A report can be made to the Board, if the reportee in good faith believes that the Office of General Counsel, the President or the CEO if is involved in dishonest/unethical/illegal conduct, including failure to take action with respect to a report. A report may be made to the Chair of the FAA Committee at FAACHair@ijm.org.
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Section 4: Contextualization

Exceptions & Addenda

Country	Country Reporting Requirements	Additional Details
IJM-AFR/EU (UK)	Whistleblower POC for the UK	<a href="mailto:Whistleblowing@ijmuk.org">Whistleblowing@ijmuk.org</a>