

7 | Whistleblower Policy

Whistleblower Policy

7.1 Concerns and Violations

We expect everyone working at PIH or on a PIH project to adhere to the guidelines set forth in this Code of Conduct. If you have any concerns or believe that any part of this Code of Conduct or any other PIH policies have been violated, we require that you report it as soon as possible. You must report it even if you were not directly involved, such as in the case of discrimination, harassment, or inappropriate fraternization. Early intervention is the best way to prevent irrevocable harm.

7.2 Reporting Policies

Each site has specific reporting procedures based on site-specific laws and regulations. You should always follow the site-specific reporting procedures for any site-based concerns. If you do not have access to site-specific reporting procedures, you may use the guidelines below. Concerns and violations may be reported either verbally or in writing. If the complaint is made verbally, the person receiving the complaint will make a written record of the complaint, including such names, dates, and other details as may be applicable. If you have a site-based concern that involves the site director, you must report it to the PIH Chief Operating Officer in Boston. Key contact information is provided at the end of this document.

Boston

- 1. **Chief Human Resources Officer.** If the Chief Human Resources Officer is involved, or you do not feel comfortable, report to
- 2. **Executive Director.** If the Executive Director is involved, report to
- 3. **PIH Chief Operating Officer.** If the Chief Operating Officer is involved, report to
- 4. **PIH General Counsel**
- 5. **PIH Chair of the Audit Committee**

Sites

- 1. **Site HR Manager.** If the HR Manager is involved, or you do not feel comfortable, report to
- 2. **Program Manager.** If the Program Manager is involved, report to
- 3. **Site Director.** If the Site Director is involved, report to
- 4. **PIH Chief Operating Officer.** If the Chief Operating Officer is involved, report to
- 5. **PIH General Counsel**
- 6. **PIH Chair of the Audit Committee**

PIH also provides a Keep Us Honest Hotline to report tips and complaints anonymously. Information about this service is available at www.pih.ethicspoint.com, or you may simply use the toll-free number or e-mail address provided below. This information will also be distributed and posted at each PIH office in appropriate common areas.

Keep Us Honest Hotline

Toll-free phone	+1-866-893-7337
Confidential e-mail	keepushonest@pih.org

7.3 Confidentiality

PIH will strive to protect the rights and privacy of all persons reporting about or involved in the investigation of a concern or complaint, to the extent that it does not impede a fair and thorough investigation. We will also protect the confidentiality of those persons accused of misconduct to the extent possible.

7.4 Non-retaliation Policy

Anyone who files a complaint in good faith will be protected from retaliatory action by PIH. PIH will not remove, discharge, demote, suspend, threaten, harass, or in any other manner discriminate against any person working at PIH, or at any of its subsidiaries or affiliates, on a PIH project with respect to good faith reporting of complaints. Any person who retaliates against another individual for reporting perceived violations of this Code of Conduct or for participating in the investigation of reported violations will be subject to disciplinary action up to and including termination of their employment with PIH. Materially adverse acts or omissions that would be sufficient to discourage a reasonable person from making or supporting a complaint will be considered retaliation.

7.5 Investigation

Reported concerns and violations will be investigated in a manner that is consistent with the nature of the complaint, the persons involved, any site-based or legal requirements, and any other factors that PIH management deems relevant. If necessary, PIH will retain the services of outside investigators to ensure a full, fair, and impartial investigation.

7.6 Disciplinary Actions

If Partners In Health finds that any part of this Code of Conduct has been violated, the violator will be subject to appropriate disciplinary action. The specific corrective and disciplinary action taken will be within PIH's discretion and may include termination of the violator's employment or assignment with PIH. In addition, conduct that is unlawful may subject workers to civil or, in some cases, criminal liability.

Partners In Health recognizes that false accusations can cause serious harm to innocent persons. If an investigation results in a finding that the complainant knowingly, falsely accused another person of any violation or inappropriate activity, the complainant will be subject to disciplinary action, up to and including termination of employment and/or legal prosecution in accordance with applicable laws.