

WHISTLEBLOWER POLICY

ALLIANCE FOR GLOBAL WATER ADAPTATION (AGWA)

General

AGWA's policies on fraud, corruption, anti-harassment, conflicts of interest, sexual exploitation, abuse, and harassment (SEAH), anti-discrimination, equal employment, and other essential organizational policies (hereafter referred to as the "Code") require directors, officers, employees, and external consultants to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the organization, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

It is the responsibility of all directors, officers, employees, and external consultants to comply with the Code and to report violations or suspected violations in accordance with this Whistleblower Policy.

No Retaliation

No director, officer, employee, or external consultant who in good faith reports a violation of the Code shall suffer harassment, retaliation, or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within the organization prior to seeking resolution outside the organization.

Reporting Violations

The Code addresses the organization's open-door policy and suggests that employees, external consultants, or general members share their questions, concerns, suggestions, or complaints with someone who can address them properly. In most cases for employees and external consultants, their supervisor is in the best position to address an area of concern. However, if they are not comfortable speaking with their supervisor or they are not satisfied with their supervisor's response, they are encouraged to speak with someone on the Board of Directors or anyone in management who they are comfortable approaching. Board Members and managers are required to report suspected violations of the Code to the organization's compliance officer, who has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or when a whistleblower is not satisfied or is not uncomfortable with following the organization's open-door policy, individuals should contact the organization's compliance officer directly.

Compliance Officer

The organization's compliance officer is responsible for investigating and resolving all reported complaints and allegations concerning violations of the Code and, at his or her discretion, shall advise the Executive Director and/or the Board of Directors. The compliance officer is required to report to the Board of Directors at least annually on compliance activity.

Accounting and Auditing Matters

The Board of Directors shall address all reported concerns or complaints regarding corporate accounting practices, internal controls, or auditing. The compliance officer shall immediately notify the Board of Directors of any such complaint and work with them until the matter is resolved.

Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation of the Code must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Code. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

Reporting Process and Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Complaints can be submitted in writing or orally to a supervisor, Board Member, or the compliance officer. Alternatively, complaints can be submitted anonymously or confidentially by completing an online form ([linked here](#)). Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Violations

Unless submitted anonymously, the compliance officer or the AGWA representative contacted will notify the sender and acknowledge receipt of the reported violation or suspected violation within 5 business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

Compliance Officer

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