Whistleblower Policy

POLICY
If any person, in good faith, knows or suspects misconduct, dishonesty, or fraud they will be allowed to report the incident without fear of punishment or retaliation.

The correct process for reporting the incident is as follows:

- Notify the manager of the highest ranked offender that is involved
- The manager will investigate the accusation, and determine the correct response
- If the manager’s response is unsatisfactory, notify the President or Executive Director
- If these responses are unsatisfactory, file a ticket with the Board’s Risk Committee
- At any point the above steps can be skipped and a ticket can be filed with the Risk Committee

Tickets can be filed with the Risk committee in three ways:

Online
- A ticket can be submitted on the Comentario page
- The chairman of the Risk Committee will be the only person with access to this form

Written Paper
- A ticket can be submitted by filling out a form for the suggestion box located in the Amigos complex
- The office manager and a representative from HR will open the box together. Nobody is allowed to open the box alone
- They will then submit any whistleblower tickets online together
POLICY

All incidents reported to the board will be discussed by the board and appropriate measures will be taken. The privacy and reputation of individuals involved will be respected.

Once an incident is reported the process is as follows:

- The Risk Committee of the board reviews, discusses, and investigates the report
- The Risk Committee will determine whether the reporter needs to be afforded privacy
- If acceptable, the office manager and a member of HR will conduct the investigation. If these individuals are involved in the case, the Executive Director, the President, or the board itself will conduct the investigation
- The Risk Committee can either make the final judgement or bring the issue to the full board
- The judgement is executed, and any necessary new policies are created
- The report, investigation notes, the final judgement, and consequences/results will be documented by Human Resources
- If necessary, the reporter of the incident can be reassigned a new team or manager

Consequences of Violations

Violations for failing to follow the policy can include any of the following:

- A Warning
- Negative marks on annual performance review
- Demotion
- Dismissal