

Pax Christi Fund for Peace Whistleblower Policy

To help ensure that Pax Christi Fund for Peace complies with the highest standards of reporting and lawful ethical behavior, the Board of Directors establishes the following procedure for the reporting of illegal or unethical conduct in connection with Pax Christi Fund for Peace' finances or other aspects of its operation, and the retention and treatment of such complaints, including confidential, anonymous submissions received from employees or directors. This policy is not meant to replace current policy and procedures or to substitute for utilizing existing supervisory channels.

Procedures

- A. Should any person know or have a reasonable belief that persons associated with the organization plan to engage or have engaged in illegal or unethical conduct in connection with the finances or other aspect of the organization's operations, that person should immediately file a complaint with any Board Member. Examples of unethical conduct or illegal activities include violations of federal, state and local laws, billing for services not performed or for goods not delivered, fraudulent financial or other reporting, sexual or racial harassment or discrimination, theft or misuse of organizational property, or other violations of organizational policies.
- B. The complainant may file the complaint via telephone, email or in writing.
- C. The complainant has the option of filing an anonymous complaint. In either case confidentiality will be maintained.
- D. The Board member will report all complaints to the full Board of Directors.
- E. Reports will include a copy of the complaint, its date, nature and source (unless the complainant is an employee who has requested anonymity), how it was communicated, whether the Board member regards the complaint as credible, and proposals to address it.
- F. The Board will have ultimate authority over the treatment of any complaints reported to it.
- G. The organization will take appropriate action in response to any complaints, including, but not limited to, disciplinary action (up to and including dismissal from any volunteer position or termination of employment) against any person who, in the organization's assessment, has engaged in misconduct and will report such conduct to the relevant civil or criminal authorities as required by law
- H. No person who, in good faith, files a complaint shall be threatened, discriminated against or otherwise subjected to retaliation or, in the case of an employee, adverse employment consequences as a result of such a report. Moreover, a person who retaliates against someone who has filed a complaint in good faith is subject to discipline up to and including dismissal from any volunteer position or termination of employment.

- I. An individual who deliberately or maliciously provides false information may be subjected to dismissal from any volunteer position or termination of employment.
- J. Issues arising under the organization's equal opportunity policy, including the policy against harassment, employee benefit policies, and issues generally handled by individuals responsible for the organization's personnel practices and procedures are not covered by this policy, unless reasonable efforts to address such matters have already failed to resolve the issues.