



WHISTLEBLOWER POLICY

Policy:

It is the policy of International Medical Corps to comply with the letter and spirit of all laws, rules and regulations of the United States, its states, any countries in which International Medical Corps does business, and other private and public regulatory agencies, and to require all directors, officers and employees of International Medical Corps to avoid any activity which could involve International Medical Corps or its directors, officers or staff in any unlawful practice. International Medical Corps has sought to establish the highest possible standard in business and personal ethics for itself, its directors, officers and staff.

Comment:

- (1) It is International Medical Corps' policy to closely scrutinize and appropriately respond to allegations of illegal conduct or possible violations of our Code of Conduct or policies.
- (2) The following is an indicative list of the types of allegations that fall within the scope of this policy.

This list is not intended to be exhaustive.

- (a) Falsification, alteration or substitution of company records;
 - (b) Violations of the International Medical Corps Code of Conduct;
 - (c) Failure to comply with the various compliance programs of the organization;
 - (d) Authorizing, directing or participating in breaches of company policy;
 - (e) Deliberately failing to report breaches of policy, concealing such breaches or deliberately withholding relevant information concerning a breach.
- (3) All employees are responsible for continually emphasizing integrity as a standard of performance and have an obligation to cooperate fully in the investigation process. Failure to cooperate will result in disciplinary action, up to and including termination.
- (4) If reporting to the manager or supervisor is not possible and/or the person reporting wishes to remain anonymous, the **International Medical Corps Reporting Hotline** is a comprehensive reporting system in which staff can file secure, anonymous reports via phone or Internet. This system is hosted and managed by EthicsPoint—a leading industry

provider of confidential reporting systems. Hotline specialists can be reached 24 hours per day, 7 days per week to assist with reporting, as well as to provide guidance on whether a situation may be a cause for concern.

How to submit a confidential report anytime from anywhere:

- Via phone: Call your respective country hotline at the number listed at www.internationalmedicalcorps.ethicspoint.com
- Via Internet: Go to www.internationalmedicalcorps.ethicspoint.com > “File a new report”

If access to the above EthicsPoint portal or telephone number is not possible, please contact report@InternationalMedicalCorps.org for further instruction, or contact Petar Ivankovic, Compliance Auditor, at +385 21 455 281 or pIvankovic@InternationalMedicalCorps.org with any questions.

(5) All information received will be reviewed so that an appropriate investigation may, if warranted, be conducted.

(6) **SAFEGUARDS**

(a) **No Adverse Action**

No adverse employment action, such as termination or counseling, will be taken against any staff member in retaliation for reporting allegations which the staff member reasonably believes to be true.

(b) **Harassment**

Harassment of any staff member who has reported a concern in good faith will not be tolerated. If harassment is found to have occurred, appropriate disciplinary action, up to and including termination, will be taken against the harasser.

(c) **Confidentiality**

International Medical Corps will maintain confidentiality in the investigation of any allegation. Investigations and the results of investigations will be discussed only with those who are on a need-to-know basis.

(d) **Anonymous Allegations**

Staff are encouraged to put their names to allegations because appropriate follow-up questions and investigation may not be possible unless the source of the information is identified.

(e) **Malicious Allegations**

Individuals making allegations with reckless disregard for their truth or falsity may be subject to disciplinary action, up to and including termination, by International Medical Corps.