

# WHISTLEBLOWER & ANTI-RETALIATION POLICY

PSI employees are expected to observe the highest ethical standards of business, human rights, labor, environmental and financial ethics and to comply with all applicable laws, regulations, and PSI policies in the conduct of their duties. PSI urges employees to report any suspected financial or accounting impropriety, illegal and unethical business practices and behaviors without fear of retribution. Non-PSI employees, such as partners, vendors, subrecipients, program participants, and beneficiaries may also use the Whistleblower Hotline if they suspect violations.

Should an employee, whether individual contributor or manager of others, become aware of, or be concerned about, financial or other activity, which is believed in good faith to be illegal, dishonest, unethical, corrupt, fraudulent<sup>1</sup>, or in violation of any PSI policy, the employee must immediately report this to anyone listed in the **Raising Concerns** section.

Reports made by employees of violations or suspected violations, as well as the identity of whistle-blowers, will be kept confidential to the extent possible, consistent with the need to conduct a due diligence process to review, inquire or investigate as appropriate. In order to maintain the confidentiality of allegations and the fairness of the investigative process, employees should refrain from conducting any investigative activity on their own, such as contacting parties, requesting information from any source, or disclosing allegations to anyone other than those identified in this policy.

If an employee is uncomfortable reporting activity he/she believes to be improper through internal PSI channels, or is not satisfied with the response received, such activity may be reported on a confidential basis or submitted anonymously to OneTrust, the outside firm retained by PSI for this purpose, using the contact information below. OneTrust will be responsible for passing on reports they receive to PSI management or the PSI Board, so that the appropriate actions may be taken to resolve concerns raised.

PSI does not tolerate retaliation or adverse employment action of any kind against anyone who in good faith reports a suspected violation or misconduct under this policy, provides information to an external investigator, a law enforcement official or agency, or assists in the investigation of a suspected violation, even if a subsequent investigation determines that no violation occurred, provided the employee report is made in good faith and with reasonable belief in its accuracy.

Raising a concern in good faith means that you are sincere in your attempt to provide accurate information, even if the report is not—or cannot be—substantiated.

Good faith does not mean that you have to be right about the facts; it means that you honestly believe something is wrong and are not deliberately making a false report. We want you to be able to ask questions and raise issues without fear of retaliation, and understand that your concern will be treated promptly, seriously, and fairly.

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<sup>1</sup> PSI considers reportable fraud to be any act or omission that intentionally misleads, or attempts to mislead, a person or entity to obtain a financial or other benefit or to avoid an obligation. Fraud includes, but is not limited to, theft, embezzlement, misappropriation, forgery, diversion, bribery, corrupt practices, and collusion in any of the foregoing. Fraud can also be dishonesty calculated for advantage. Fraud can be either financial or non-financial and can be committed by either individuals or organizations.



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For the purposes of this policy, a reprisal includes the threat of reprisal. In addition to reporting through the internal and external PSI channels described above, PSI does not tolerate discrimination, retaliation, or reprisal of any kind for reporting or disclosing to any US government official information, including confidential or proprietary information, that the employee reasonably believes is evidence of a false claim, gross mismanagement, abuse of authority, or gross waste of funds relating to a federal grant or contract, a substantial and specific danger to public health or safety, or a violation of law, rule or regulation relating to a federal grant or contract. Employees who believe they have been subject to discrimination, retaliation or reprisal for such reports or disclosures may submit a complaint to the Inspector General of the donor agency in accordance with 41 USC. §4712 and / or applicable funder (e.g., USAID, UNITAID, DFID, Global Fund, etc.) If employees experience, witness, suspect or become aware of perceived or actual retaliation after having made a report or participated in any reviews, inquiries or investigations conducted by PSI, they must report immediately through the reporting mechanisms previously defined.

No PSI employee or officer may use their position to influence employees, retaliate against them, or prevent them from exercising their rights as provided in this policy. Any employee or officer who is found to have engaged in such behavior will be subject to corrective action, up to and including termination.

Employee complaints of harassment, retaliation, discrimination, any misconduct, or adverse employment action in violation of this policy will be promptly investigated. If an investigation results in a determination that there has been retaliation or other prohibited action against an employee, appropriate corrective action will be taken.

Employees are expected to exercise sound judgment to avoid baseless allegations. An employee who knowingly or recklessly makes an allegation or disclosure that proves to be malicious or lacking good faith, may be subject to corrective action, up to and including termination.

## **The following may result in corrective action, up to and including termination:**

- Failure to adhere to behavioral principles and standards defined in this Code;
- Any behaviors, statements, decisions, or any activity that could create a situation of perceived or actual retaliation;
- Malicious reporting of any incidents, providing false statements or raising false accusations;
- Any reports, accusations or complaints that are reviewed and/or investigated and are concluded to be malicious or not done in good faith;
- Failure to report reportable incidents as determined by inquiries or investigations due to the increased risk in jeopardizing employees' safety, rights and well-being, and compromising funding and PSI reputation.