

Field Projects International
WHISTLEBLOWER POLICY

Field Programs International (“**FPI**”) requires board members, officers, employees, and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of FPI, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

This Whistleblower Policy is intended to encourage and enable employees, volunteers, and others to raise serious concerns internally so that FPI can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees, and volunteers to report concerns about violations of FPI’s Student and Staff Handbook, violations of law or the regulations that govern FPI’s operations, and suspected financial impropriety or misuse of FPI’s resources.

No Retaliation

It is contrary to the values of FPI for anyone to retaliate against any board member, officer, employee, or volunteer who in good faith reports a violation of FPI’s Student and Staff Handbook, violations of law, violation of the regulations that govern FPI’s operations, suspected financial impropriety or misuse of FPI’s resources. A board member, officer, employee or volunteer who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment status, volunteer status, and any further disciplinary measures the Board of Directors deems appropriate.

Reporting Procedure

Board members, officers, employees, and volunteers should share their questions, concerns, suggestions, or complaints first with the Compliance Officer. If the filing of a formal complaint or report is requested by the complainant, the Compliance Officer shall document the complaint and retain a copy in digital and paper form. If an employee or volunteer is not comfortable speaking with the Compliance Officer or is not satisfied with the response, that employee or volunteer is encouraged to report to any director of FPI. Upon the bringing of any complaint or report to a board member, the receiving board member will likewise document the complaint or report and retain a digital copy and a paper copy.

Compliance Officer

FPI’s Compliance Officer is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Compliance Officer will be appointed by the Board of Directors to advise the Board of all complaints and their resolution. The Compliance Officer shall report at least annually on compliance activity relating to accounting or alleged financial irregularities.

Acting in Good Faith

Any good faith report, concern, or complaint is fully protected by this policy, even if the report, question, or concern is, after investigation, not substantiated. Anyone filing a complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of standards set out above. Any allegations that prove not to be substantiated and have been made maliciously or with knowledge that they were false will face reasonable disciplinary action in the Board's discretion.

Assurance of Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant. They may also be submitted anonymously by filling out a Whistleblower Reporting Form available on FPI's public website. Such reports will go directly to the Compliance Officer. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation and with the understanding that confidentiality may not be maintained where identification is required by law.

Handling of Reported Violations

All reports will be promptly investigated by the Compliance Officer and appropriate corrective action will be taken if warranted by the investigation. The Compliance Officer will inform the complainant that follow-up has or is occurring within two weeks after the complaint or report has been received. The full FPI Board of Directors shall be informed of all such complaints or reports that resulted in an investigation. In the event the subject of the complaint concerns a member of the Board directly, that board member shall be excused from any matters related to the investigation and resolution of the complaint. Following the investigation, the Board will ensure that either all problems revealed by the investigation have been addressed or an explanation has been given to the reporting party of why corrective action is not necessary.

Complaint Retention Policy

All complaints and reports shall be stored in digital form for a minimum of 2 years. All complaints will be stored in paper form in the Compliance Officer's office for at least 3 months. Complaints that resulted in a criminal investigation or disciplinary proceeding shall be retained for 7 years in digital format.