

## WHISTLEBLOWER POLICY

### Purpose

The purpose of VisionFund India's Whistleblower Policy is to provide an alternative mechanism, beyond those outlined in the Code of Conduct (COC), for reporting illegal behavior, misconduct, or activities that violate professional standards, or are otherwise inconsistent with VisionFund India's COC and Core Values. This policy allows staff to report an issue that they may not be comfortable disclosing through normal channels of communication out of fear of retaliation, or to their direct supervisor, as their direct supervisor may be implicated in the reporting.

### Scope

This policy applies to all VisionFund India staff, interns, volunteers, and board members. Additionally, this policy is applicable to all clients, donors, visitors, contractors, and vendors of VisionFund India.

### Policy Statement

VisionFund India strives to promote a corporate culture that reflects the highest legal standards and ethical conduct. In keeping with this ideal, VisionFund India is committed to building a work environment that promotes these standards through its talent acquisition, management oversight, business processes and controls, and reporting and complaint procedures. VisionFund India also provides mechanisms, such as this Whistleblower Policy, to report violations of standards confidentially, in the event that other methods of reporting or accountability do not apply. This enhances the likelihood that serious breaches of the COC will be disclosed, investigated, and addressed with corrective and disciplinary action, as needed. To this end, VisionFund India will:

- Maintain Integrity and Protection Hotline (IPH or whistleblower) procedures for the receipt, retention, and treatment of allegations of misconduct;
- Provide a mechanism that allows persons to report misconduct confidentially or anonymously ("whistleblower");
- Promptly respond to complaints and investigate as appropriate;
- Take appropriate corrective action where claims of unlawful or unethical behaviour are substantiated;
- Take appropriate corrective action if false or unsubstantiated allegations are made and/or the IPH process is abused;
- Not tolerate retaliation against any good faith whistleblower, including staff who cooperate in an investigation. Any employee who violates this policy (including, but not limited to, violation of a whistleblower's anonymity or retaliation against a whistleblower) shall be subject to corrective or disciplinary action, as deemed appropriate by VisionFund India.

### Misconduct Covered by the IPH Procedures

The IPH procedures are intended to address allegations of "Misconduct," defined as including any of the following:

- Violations of law;
- Violations of VF India policy;
- Actions perceived as unethical;
- Other matters which may cause financial loss to VisionFund India or damage its reputation or be otherwise detrimental to its interests.

The IPH process should not be used for matters handled by the People & Culture (P&C) grievance processes (e.g., sexual harassment allegations, dissatisfaction with a manager, complaints about the work environment, issues concerning pay or benefits). These should be referred to the appropriate P&C representative. If the P&C grievance process is perceived as inadequate or inappropriate, allegations may be lodged with the IPH process, where the IPH intake team will evaluate whether to accept it as an IPH matter or refer it back to the appropriate P&C process.

### **Reporting Mechanism**

To report an allegation online, whistleblowers can visit the IPH website at [EthicsPoint - World Vision International](https://ethicspoint.worldvisioninternational.org)

The landing page of the website has a platform for confidential reporting. Whistleblowers can also call by phone using the International Toll-Free Service (ITFS)

India - 000-800-100-1071 and 000-800-001-6112

The website provides information on what and how to report an alleged illegal event, issue, or matter.

### **Content of Allegations**

It is expected that the report will provide specific and factual information including the following:

- Facts describing the alleged event, issue, or matter;
- Name of person, dates, time, frequency of location;
- Witnesses and available evidences to support the allegation.

### **Treatment of Allegations**

- All allegations will be diligently acknowledged, recorded, and screened by the IPH team.
- All bona fide reports will be relayed to appropriate VF management teams and investigated by the IPH team or its designee(s); conclusions from investigations will be forwarded, under strict confidentiality rules, to the appropriate VisionFund India leadership for appropriate corrective action.
- Any person(s) whose behavior has been implicated will be informed, as appropriate, of the investigation and allowed to provide evidence that may prove their innocence.
- If the person whose behavior has been implicated by an allegation is a VF board member, the VF Regional P&C shall be informed and provided with oversight of the investigation.
- At the conclusion of the investigation, a case closure response will be sent to the whistleblower(s) informing them the IPH process has been followed and has now been completed.
- If there is an abuse of the process by the whistleblower, VF reserves the right to pursue disciplinary action, as appropriate.

### **Note**

VisionFund India will not entertain any anonymous complaint letter from staff. Any attempt to deter an employee from raising a legitimate concern about fraud, bribe, misuse of funds, abuse, misconduct, or any violation of the COC is a serious offense that will lead to disciplinary action up to, and including, termination. Persons who believe they have been retaliated against for reporting a complaint or assisting in the investigation process are encouraged to report the incident to P&C Representative.

This policy is an internal control mechanism aimed at mitigating risk to VisionFund India. As such, VisionFund India expects every individual to which this policy applies (as defined under Scope) to adhere to the tenets of this policy and to maintain the utmost confidentiality regarding any whistleblower incidents.