



	GLOBAL WHISTLE BLOWER AND COMPLAINT MECHANISM POLICY
Applicable to	All iMMAP personnel Sub-contractors/implementing partners
Issued date	December 1 st , 2020

1. PURPOSE/STATEMENT

iMMAP is committed to the highest possible standards of ethical, moral and legal business conduct. In conjunction with this commitment and iMMAP's commitment to open communication, this policy aims to provide the assurance, for all persons reporting an abuse, that they will be protected from reprisals or victimization for whistleblowing in good faith¹.

2. SCOPE AND COVERAGE

The whistleblowing policy is intended to cover serious concerns that could have a severe impact on iMMAP and its beneficiaries, such as actions like corruption, malfeasance, abuse of power, sexual harassment/exploitation/abuse, discrimination, and any other act that is not in line with any of iMMAP's policies or Code of Conduct.

This policy applies to all iMMAP personnel worldwide, regardless of contractual status (local national personnel, international consultants/service providers, employees), as well as to sub-contractors/implementing partners.

This policy also aims to cover and ensure duty of care for third parties such as the beneficiary and hosting communities.

Regular business matters should be directed to the iMMAP focal person (direct line manager, Country Director or Contract Management Focal Point) and are not addressed by this policy.

3. RELATED DOCUMENTATION

The Whistle Blower Policy and its principles must be disseminated in different ways to iMMAP personnel, sub-contractors/implementing partners and beneficiary/hosting communities. The dissemination procedure is detailed in **Annex A-Dissemination Procedure** to this policy.

4. DEFINITIONS

Corruption - Grant or reception of commissions or illicit favors.

Malfeasance - Misappropriation of aid given to aid recipients, misuse of iMMAP resources for personal purposes, accounting fraud.

Abuse of power - Use of one's position to obtain unwarranted goods, services, or sexual favors.

Sexual harassment, exploitation and abuse - Sexual harassment or assault committed with force, coercion, or in favor of unequal intercourse.

Non-respect of the person - Harassment, humiliation, intimidation, or attacks on physical and moral integrity, and endangerment of others.

Discrimination - Discrimination in hiring and within the context of work, discrimination during a contract or the provision of humanitarian aid.

Any other act that is not in line with any of iMMAP's policies or Code of Conduct.

¹ Good faith refers to acting for the betterment of individual(s) and the organization as a whole, and not done primarily with malicious intent such as to damage individual(s) or the organization



5. SAFEGUARDS:

Harassment or Victimization

iMMAP has a zero-tolerance policy against the harassment or victimization of individuals submitting hotline reports. Any iMMAP personnel found guilty of harassment or victimization of individuals submitting reports of fraud, waste and/or abuse will be punished in line with iMMAP's Disciplinary Policy.

Confidentiality

Every effort will be made to protect the reporter's identity by the hotline vendor (Lighthouse Services). Please note that the information provided in a hotline report may be the basis of an internal and/or external investigation by iMMAP into the issue being reported.

Anonymous Allegations

In case of anonymous allegations, consideration will be given to:

- The seriousness of the issue raised;
- The credibility of the concern; and
- The likelihood of confirming the allegation from attributable sources.

Malicious Allegations

Malicious and/or false allegations may result in disciplinary action.

6. PROCEDURE

6.1 Reporting

The whistleblowing procedure is intended to be used for serious and sensitive issues. Serious concerns relating to financial reporting, unethical or illegal conduct, should be reported in any of the following ways: Phone call, email, or fax.

For your convenience, Lighthouse Services provides a toll-free number along with several other reporting methods, all of which are available 24 hours a day, seven days a week, for use by all iMMAP personnel, beneficiaries and sub-contractors/implementing partners. These services are offered in Arabic, English, French and Spanish.

Website: www.lighthouse-services.com/immap

Toll-Free Telephone:

Direct Dial

English speaking: +1-844-420-0044

Spanish speaking: +1-800-216-1288

French speaking: +1-855-725-0002

AT&T USA Direct

All other languages: +1-800-603-2869 (must dial country access code first click here for access codes and dialing instructions)

E-mail: reports@lighthouse-services.com (must include iMMAP US or iMMAP France in the report)

Fax: +1-215-689-3885 (must include iMMAP US or iMMAP France in the report)

Lighthouse Services specializes in providing independent third-party ethics hotline services to organizations of all types and sizes.



Reporters to the hotline will have the ability to remain anonymous if they so choose. Please note that the information provided by you may be the basis of an internal and/or external investigation into the issue you are reporting, and your anonymity will be protected. Reports are submitted by Lighthouse to iMMAP's Chief Executive Officer and HR Director.

Employment-related concerns may continue to be reported through the normal professional channels such as the direct line manager or Contract Management Focal Points, local HR Representative, or to the iMMAP HR Director or Chief Executive Officer. If a reporter does not feel comfortable using these channels, they may use the aforementioned reporting hotline.

6.2 Timing

The earlier a concern is expressed, the easier it is for action to be taken.

6.3 Evidence

Although a reporter is not expected to prove the truth of an allegation, the iMMAP personnel submitting a report needs to demonstrate in their hotline report that there are sufficient grounds for concern.

6.4 How the Report will be Handled

The action taken will depend on the nature of the concern. iMMAP's HR Director and Chief Executive Officer receives a copy of each report and any follow-up reports.

6.5 Initial Inquiries

Initial inquiries will be made to determine whether an investigation is appropriate, and the form that it should take. Some concerns may be resolved by agreed-upon action without the need for an investigation.

6.6 Feedback to Reporter

Whether reported directly to iMMAP's HR Director or Chief Executive Officer, or through the Lighthouse hotline, the individual submitting a report will be given the opportunity to receive follow-up on their concern:

- * Acknowledging that the concern was received;
- * Indicating how the matter will be dealt with;
- * Given an estimate of the time that it will take for a final response;
- * Informing them whether initial inquiries have been made;
- * Informing them whether further investigations will follow, and if not, why.

6.7 Informing Mentioned Persons

After consideration is made for the nature of reports, particularly if mentioned persons may be involved in the investigations, the HR Director or Chief Executive Officer will contact persons mentioned in all reports and transparently provide details of the report, investigations performed, and conclusions.

Only in the case of malicious reports, and when the HR Director and CEO determine that informing mentioned persons of reports shall be detrimental to the person's wellbeing, will the information present in the reports be withheld.

6.8 Further Information

The amount of contact between the individual submitting a report and the body investigating the concern will depend on the nature of the issue, the clarity of information provided, and whether the iMMAP personnel reporting remains accessible for follow-up. Further information may be sought from the reporter.



6.9 Investigation Responsibilities

The HR Director has the primary responsibility for conducting investigations. The investigation team should be comprised of at least two members. If the investigation substantiates that fraudulent activities have occurred, the investigation team will issue reports to appropriate designated personnel and, if appropriate, to the Board of Directors. All work of the investigation team should be documented, including transcripts of interviews conducted. The conclusion of all investigations must be documented. The Investigation Report will contain all details relating to the investigation and a timeline of all the events which took place. The investigation should be held in a timely manner.

The person(s) that initially reported the suspicions should be informed of the outcome of the investigation. This should be done only once the report and proposed course of action has been finalized.

Decisions to prosecute or refer the examination results to the appropriate law enforcement and/or regulatory agencies for independent investigation will be made in conjunction with legal counsel and senior management, as will final decisions on disposition of the case.

Authorization for Investigating Suspected Fraud

Members of the Investigation Unit will have:

- Free and unrestricted access to all organization records and premises; and
- The authority to examine, copy, and/or remove all or any portion of the contents of files, desks, cabinets, and other storage facilities on the premises without prior knowledge or consent of any individual who might use or have custody of any such items or facilities, when it is within the scope of their investigation.

Outcome of an Investigation

At the discretion of iMMAP and subject to legal and other constraints, the reporter may be entitled to receive information about the outcome of an investigation.

7. CONSERVATION OF PERSONNEL DATA

- Any complaint report received by Lighthouse Services and deemed as not falling within the scope of the whistleblowing mechanism, shall be destroyed without delay.
- Data within the scope of the whistleblowing mechanism but deemed unfounded, is destroyed without delay.
- In both aforementioned cases, the sender is informed of the non-follow-up regarding their request and the destruction of the complaint report.
- When the complaint report is not followed up by disciplinary or judicial proceedings, all data relating to this report shall be archived within two months of the closure of the verification operations.
- When disciplinary judicial proceedings are brought against the person involved or the author of an abusive report, all data relating to the report is stored until the end of the proceeding and then archived.
- Data subject to archiving measures is stored in a separate information system with restricted access.



8. Entry in Force

This Whistleblower and Complaint Mechanism Policy is effective on the date of its issuance. iMMAP reserves the right to change, amend, modify, suspend, add or terminate all or any part of this policy at any time; in such cases, all personnel, sub-contractors/implementing partners will be notified immediately. This policy supersedes any previous policies or non-existing policies on whistleblowing and complaint mechanism.

Signed and Approved	
William E. Barron, Chief Executive Officer, iMMAP Inc.	Christophe Bois, President, iMMAP France
	