

THE HUNGER PROJECT WHISTLEBLOWER PROTECTION POLICY

General

The Hunger Project requires directors, officers, and staff to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Staff and representatives of the organization must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

Any staff member who has engaged in, or who reasonably suspects any other staff or Board member of the organization of engaging in, any violation of the law, regulations or ethical standards must report such activity as soon as possible. Such activity may include, but is not limited to, financial wrongdoing (including violation of internal controls or the accounting policies of the organization), fraud, harassment, or any other illegal or unethical conduct.

No Retaliation

No director, officer, or staff member who in good faith reports a violation shall suffer harassment, retaliation, or adverse employment consequence. Any staff member who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower Protection Policy is intended to encourage and enable staff and others to raise serious concerns within the organization prior to seeking resolution outside the organization.

Reporting Violations

This document addresses the organization's open-door policy and suggests that staff share their questions, concerns, suggestions, or complaints with someone who can address them properly. In most cases, as staff member's supervisor is in the best position to address an area of concern. However, if a staff member is not comfortable speaking with her/his supervisor or is not satisfied with the supervisor's response, the staff member is encouraged to speak with Human Resources or anyone in management whom you are comfortable approaching. Supervisors and managers are required to report suspected violations to the Chief Financial Officer and/or President/CEO. Furthermore, if a staff member does not believe that these channels of communication can or should be used to express her/his concerns, the staff member may contact the Chair of the Governance, Nominating and Human Resources Committee of the Board. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation. Reports are preferred in writing and may be anonymously. The organization shall file all back up documentation related to reports and actions taken.

Accounting and Auditing Matters

The Audit and Finance Committee of the Board shall address all reported concerns or complaints regarding corporate accounting practices, internal controls, or auditing. The Chief Financial Officer and/or President/CEO shall immediately notify the Audit Committee of any such complaint and work with the Committee until the matter is resolved.

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Acting in Good Faith

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. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.