

# **National Peace Corps Association Whistleblower Policy**

Approved December 11, 2022

## **Purpose:**

National Peace Corps Association's (NPCA) Code of Ethics and Conduct (CEC) requires directors, committee members, staff, interns, fellows and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Employees and all representatives of NPCA must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

## **Compliance officer:**

The NPCA compliance officer is the NPCA Board Treasurer and chair of the finance committee. The compliance officer is responsible for investigating and resolving all reported complaints and allegations concerning violations of the corporate accounting practices, misuse of financial assets, audit policy and all other financial issues and, at his/her discretion, shall advise the president and/or the finance committee. The compliance officer is required to report to the finance committee at least annually on compliance activity. The compliance officer will inform the Board of any reported violations at the next quarterly Board meeting.

## **Reporting Responsibility:**

It is the responsibility of all directors, officers and employees – which for purposes of this policy shall include interns, fellows and consultants – to comply with the CEC and to report violations or suspected violations in accordance with this Whistleblower Policy. If any director, officer or employee believes that some policy, practice, or activity of NPCA is in violation of law, he/she may file a written complaint with the Board chair or with the NPCA compliance officer for financial issues.

## **No Retaliation:**

No director, officer or employee who reports a violation of the CEC shall suffer harassment, retaliation or adverse employment consequences. An employee who retaliates against someone who has reported a violation is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable employees and others to raise concerns within NPCA prior to seeking resolution outside NPCA.

## **Reporting Violations:**

The CEC addresses the NPCA open door policy and suggests that employees share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an employee's supervisor is in the best position to address an area of concern. However, anyone not comfortable speaking with their supervisor or who is not satisfied with their supervisor's response is encouraged to speak with anyone in management with whom they are comfortable. Supervisors and managers are required to report suspected violations of

financial issues of the CEC to the NPCA compliance officer, who has specific and exclusive responsibility to investigate all such reported violations. When individuals are dissatisfied or uncomfortable with following the NPCA open door policy, they should contact the Chair directly or, for suspected fraud, with the NPCA compliance officer.

**Accounting and Auditing Matters:**

The Board finance committee shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The compliance officer shall immediately notify the finance committee of any such complaint and work with the committee until the matter is resolved. 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.

**Handling of Reported Violations:**

The compliance officer will acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation. This Whistleblower Policy and the CEC shall be made available to all Board directors, committee members, staff, interns, fellows and volunteers who will have the opportunity to ask questions about these policies.