

# Aparajeyo-Bangladesh: Whistle Blower Policy

The whistle blower policy provides a mechanism for the reporting of illegal activity or the misuse of AB assets while protecting the employees who make such reports from retaliation.

**Questionable Conduct.** This policy is designed to address situations in which an employee suspects another employee has engaged in illegal acts or questionable conduct involving AB's assets. This conduct might include outright theft (of equipment or cash), fraudulent expense reports, misstatements of any accounts to any manager or to AB's auditors, or even an employee's conflict of interest that results in financial harm to AB but also extends to acts of corruption. Aparajeyo-Bangladesh encourages staff to report such questionable conduct and has established a system that allows them to do so anonymously if necessary.

**Making a Report.** If an employee suspects illegal conduct or conduct involving misuse of AB assets or in violation of the law, he or she may report it, anonymously if the employee wishes, and will be protected against any form of harassment, intimidation, discrimination or retaliation for making such a report in good faith.

Employees can make a report to any of the following AB executives at any time: Chairperson, Executive Director General, Director Programmes, or Assistant Directors. Their names and contact information are available on the AB Intranet site and at the end of this policy statement. Reports can be made by telephone or in writing. AB will promptly conduct an investigation ( into matters reported, keeping the informant's identity as confidential as possible consistent with our obligation to conduct a full and fair investigation.

***Alternatively, employees can make a report by calling an independent “whistle blower” phone line that will be answered by an outside company. The information provided will be forwarded promptly to AB for investigation. Callers to the whistle blower hotline may remain anonymous if they wish. The whistle blower phone line and access requirements are set out at the end of this policy which is also on the AB Intranet site.***

All reports received either directly or via the Whistleblowing hotline will be passed to the AB Audit Committee, This Committee is independent of Aparajeyo-Bangladesh management and reports to the Aparajeyo-Bangladesh Board of Directors.

## **Protection of Employees Who Report Misuse of AB Assets**

**No Retaliation.** An employee who has made a report of suspicious conduct and who subsequently believes he or she has been subjected to retaliation of any kind by any AB employee is directed to immediately report it to the Director Programmes. Reports of retaliation will be investigated promptly in a manner intended to protect confidentiality as much as practicable, consistent with a full and fair investigation. The party conducting the investigation will notify the employee of the results of the investigation.

AB strongly disapproves of and will not tolerate any form of retaliation against employees who report concerns in good faith regarding AB's operations. Any employee who engages in such retaliation will be subject to discipline up to and including termination.

**Ms. Wahida Banu**– Executive Director 01713000632, [wahida@aparajeyo.org](mailto:wahida@aparajeyo.org)

**Mr. Eric Thipthorpe** – Director Programmes 01730615012, [eric@aparajeyo.org](mailto:eric@aparajeyo.org)

**Note: This Whistle Blower Policy is an integral part of AB’s Fraud/Corruption Prevention and Investigation Policy.**