

Whistleblower Policy



This policy applies to all Habitat for Humanity International, or HFHI, entities, including headquarters, area offices, branches and consolidating entities. Legally independent national organizations and affiliates are encouraged to adopt their own policies that incorporate the provisions of this policy or otherwise ensure that the intent of this policy is covered in the entity's existing policies. National organizations and branches must complete the attached Acknowledgment Form, which should be sent to the entity's respective area office finance director or his or her designee.

Habitat for Humanity is committed to the highest standards of ethical, moral and legal conduct. Habitat is further dedicated to acting in good faith with directors, officers, employees, contractors or volunteers who raise concerns regarding unlawful activity, violations of Habitat policies, or other improper conduct of any board member, officer, employee, contractor or volunteer of Habitat.

The purpose of this policy is to:

- Provide a mechanism for members of the board of directors, officers, employees, interns and AmeriCorps members of, and contractors and volunteers for Habitat for Humanity entities to raise good faith concerns regarding suspected misconduct or violations of law or Habitat for Humanity policies;
- Facilitate cooperation in any internal or governmental investigation or inquiry regarding potential misconduct or violations of law or Habitat for Humanity policy;
- Protect individuals – including their anonymity and safety – who take such action from retaliation or any threat of retaliation by any employee or agent of Habitat for Humanity; and
- Promote a culture of accountability and transparency (i.e., “if you see something, say something”).

REMEMBER

If you see something, say something.

A. Expectations for reporting

1. Members of the board of directors, officers, employees, interns, AmeriCorps members, contractors and volunteers of Habitat for Humanity are encouraged and expected to identify potential misconduct or suspected violations of the law or Habitat for Humanity policy, to report such suspected violations, and to provide truthful information in connection with any official inquiry or investigation of alleged violations.
2. Any officer, employee, contractor, intern, AmeriCorps member or volunteer for Habitat for Humanity who has knowledge or reasonable suspicion of the occurrence of misconduct, unlawful activity or a violation of Habitat for Humanity policy must immediately notify his or her direct supervisor or use the anonymous notification process set forth in Section A.3 of this policy. If the individual has reason to believe that his or her direct supervisor may be involved in the misconduct, unlawful activity or violation of Habitat for Humanity policy, he or she must immediately notify the HFHI Internal Audit department, or IAD, at (404) 962-3481 or use the anonymous notification process set forth in Section A.3 of this policy.

DEFINING MISCONDUCT

“Misconduct” is any activity that violates the Habitat for Humanity Ethics Covenant or other applicable policies, standards, laws or regulations.

If for any reason the individual cannot notify HFHI IAD or follow the process for anonymous notification, he or she must immediately notify a member of HFHI's senior management. Any board member who has knowledge of or suspects the occurrence of improper conduct, unlawful activity or a violation of Habitat for Humanity policy must notify HFHI IAD or use the anonymous notification process set forth in Section A.3 of this policy.

3. Anonymous reports regarding suspected misconduct, violations of law or Habitat for Humanity policy may be made to the MySafeWorkplace® hotline:
 - a. Online at [the MySafeWorkplace® website](#).
 - b. Inside the United States, call (800) 461-9330.
 - c. Outside the United States, call collect at +1 (720) 514-4400 or find a local toll-free phone number from [the MySafeWorkplace® website](#).
4. Significant or egregious failure to report misconduct, violations of the law, or Habitat for Humanity policy may be subject to discipline, up to and including termination of employment. This will be in Habitat for Humanity's judgment based on the length of time and extent of knowledge, and the severity of the misconduct or violation.

B. Expectations of non-retaliation

1. Habitat for Humanity expressly prohibits any form of retaliation, including harassment, intimidation, adverse employment actions, or any other form of retaliation, against members of the board of directors, officers, employees and contractors of or volunteers for Habitat for Humanity who, in good faith, raise concerns of misconduct or suspected violations of law, cooperate in inquiries and investigations, or identify potential violations of Habitat for Humanity policies.
2. Any person who believes that he or she has been subjected to any form of retaliation as a result of reporting a suspected violation of law or policy or for cooperating in an inquiry or investigation should immediately report such incident to his or her direct supervisor, the HFHI chief people officer (CPO) or the HFHI vice president of internal audit. Supervisors, managers and other staff members who receive complaints of retaliation must immediately inform HFHI's CPO.
3. Any person who engages in retaliation prohibited by this policy will be subject to discipline up to and including termination of employment.

C. Expectations for investigation

1. Reports of misconduct, suspected violations of law or policy, and retaliation will be investigated promptly by HFHI Internal Audit, HFHI Human Resources, and/or the HFHI Legal department in a manner intended to protect confidentiality.

This policy is intended to supplement and provide further context to the Habitat for Humanity Ethics Covenant and policies such as:

- HFHI's Employee Handbook
- Fraud Policy
- Policy on Harassment, Bullying and Discrimination
- Policy of Protection from Sexual Exploitation and Abuse
- Policy on the Prohibition of the Promotion or Advocacy of the Legalization or Practice of Prostitution or Sex Trafficking
- Policy of Protection from Sexual Exploitation and Abuse in Humanitarian Crises
- Standards of Behavior in Humanitarian Response Operations
- Volunteer Code of Conduct

It does not supersede or replace these guidance documents.

MYSAFE WORKPLACE

*MySafeWorkplace®
is Habitat's
confidential and
anonymous
reporting hotline,
which is operated
by a third-party
service provider
and available for
any Habitat
representative to
report concerns.*

Acknowledgment

The Whistleblower Policy describes important information about Habitat for Humanity International's expectation that all Habitat representatives report suspected misconduct, unlawful activity or violations of Habitat for Humanity policies, as well as the protection of individuals make such good faith reports from retaliation. I acknowledge that I have read and reviewed the requirements contained in the policy and agree that I will follow them.

I also understand that I should consult with the Human Resources department, the Legal department or the Internal Audit department regarding any questions not answered in this policy.

SIGNATURE

DATE RECEIVED

NAME (TYPED OR PRINTED)

Policy Acknowledgment Form for National Organizations: Whistleblower Policy

Entity name: _____

Country: _____

INSTRUCTIONS

1. The policy acknowledgement form must be read and signed by the entity's CEO, CFO or designee. If the entity is able to comply with or meet the intent of the policy, then a copy of the policy acknowledgment form must be forwarded to the appropriate area office. The entity should maintain the original form for documentation purposes.
2. If the entity is not able to comply with or meet the intent of the policy, an exception must be requested. The exception request must be documented below and include: a) the section of the policy for which the exception is being requested; b) references to any local laws or business justifications; and c) the proposed alternative. The original of the policy acknowledgment form must be sent to the appropriate area office for review and agreement. The area office will send the original form to HFHI Internal Audit and Legal departments for final approval. The completed/approved form will be returned to the appropriate area office and the originating entity, HFHI Internal Audit, HFHI Legal department, and the area office. The entity must keep copies of the approved exception.

I hereby certify that I have read the attached policy and fully understand the policy and therefore:

- ☐ I acknowledge and confirm that the attached policy has been adopted in substance by this organization.
- ☐ I acknowledge and confirm that the attached policy has been adopted in substance by this organization, except for the specific paragraph(s) noted below.
- ☐ I acknowledge and confirm that the tenets and intentions of the attached policy have been covered in the organization's existing policies.

Entity acknowledgment:

Entity CEO (Print Name)

Entity CFO (Print Name)

Entity CEO (Signature)

Entity CFO (Signature)

Date

Date

For exceptions: Note policy section number and text for which the exception is being requested, justification for the exception, and proposed alternative:

Name (print or type):		Department:
Signature:	Full phone number:	Date:
Recommend approval: (area office officials must ensure sufficient detail is provided by the national office to support recommendation)		

HFHI Legal department approval:

Name (print or type):		Department:
Signature:	Full phone number:	Date:

Change history

Date	Modification	Approved by
Release Date: May 15, 2012 Effective Date: June 15, 2012	Initial policy approval	• Juan Montalvo, VP of Internal Audit • Connie Steward – SVP Human Resources, Learning & Organizational Development • Liz Blake, SVP – Government Affairs, Advocacy, Legal • IBOD
April 2014	Revised telephone contact number to (404) 962-3425.	
Sept 2016	Revised telephone contact for Internal Audit and updated link and telephone for MySafeWorkplace.	
March 2018	Added employee policy acknowledgment form.	
October 2018	Updates for safeguarding initiative	• Juan Montalvo, Vice President of Internal Audit • Valerie Norton, Chief People Officer • Hilary Harp, Senior Vice President of Legal and General Counsel