

# IIRR Global Whistleblower Policy

## Introduction

IIRR is committed to advancing equitable, sustainable rural development while maintaining the highest standards of honesty, integrity, and ethical conduct. Because IIRR's work involves managing diverse resources and public trust across multiple countries, ensuring organizational integrity is a non-negotiable priority. IIRR recognizes its fundamental responsibility to ensure that all trustees, officers, and employees practice ethical behavior in fulfilling their duties and complying with all applicable laws and regulations.

This Whistleblower Policy establishes the standards, reporting systems, and accountability mechanisms required to address "Wrongful Conduct" and protect those who report it. It forms part of IIRR's broader ethical framework, which includes the Global Safeguarding Policy, Code of Conduct, Anti-Harassment and Non-Discrimination Policies, and HR Policy.

## Definitions and Scope

This policy applies to all trustees, officers, employees, and other representatives of IIRR. It is intended to encourage the reporting of serious improprieties that potentially impact the integrity and effective operation of the organization.

"**Wrongful Conduct**" includes, but is not limited to:

- A serious violation of IIRR internal policies.
- A violation of applicable national, state, or local laws or regulations.
- The use of IIRR's property, resources, or authority for personal gain or any other non-organizational purpose, except as specifically provided under IIRR policy.
- Other illegal or improper activities that compromise the organization's ethical standards.

## Reporting Mechanisms and Pathways

IIRR encourages its representatives to share questions, concerns, or complaints with those who can address them properly. Any individual who becomes aware of suspected or actual Wrongful Conduct should report it immediately through the following pathways:

- **Primary Reporting:** Concerns may be reported to the President or the Chair of the Board of Trustees.
- **Alternative Reporting:** If the conduct implicates the President or the Board Chair, or if the reporter is uncomfortable speaking with them, the issue may be reported to any member of the Board of Trustees.
- **Board Notification:** Any recipient of a report is required to immediately advise the full Board of Trustees of the disclosure.

- **Confidentiality and Anonymity:** Reports may be submitted on a confidential basis or anonymously. IIRR will maintain confidentiality to the extent possible, consistent with the requirement to conduct a thorough and adequate investigation.

### **Protection and Anti-Retaliation**

IIRR maintains a zero-tolerance approach toward retaliation against those who raise concerns in good faith.

- **No Retaliation:** No individual who in good faith reports Wrongful Conduct will suffer harassment, retaliation, or adverse employment consequences.
- **Disciplinary Action:** Any person who retaliates against a whistleblower is subject to discipline, up to and including termination of employment or removal from the Board.
- **Good Faith Requirement:** Anyone filing a complaint must have reasonable grounds for believing the information indicates Wrongful Conduct. Allegations proven to be made maliciously or with the knowledge they were false will be treated as a serious disciplinary offense.

### **Response and Accountability**

Upon receiving a report of Wrongful Conduct, IIRR will initiate a prompt and impartial investigation.

- **Acknowledgment:** A Board representative will acknowledge receipt of the report to the complainant within five business days, unless the report was submitted anonymously.
- **Investigation:** All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the findings.
- **Survivor-Centered Principles:** In cases where Wrongful Conduct intersects with safeguarding issues, responses will follow survivor-centered principles of safety, dignity, and respect for agency.

### **Conclusion**

Transparency and ethical conduct are central to IIRR's mission and operational integrity. Through these robust reporting systems and an unwavering commitment to non-retaliation, IIRR ensures that its staff and representatives can raise serious concerns internally to safeguard the organization's reputation and the rights of those it serves.