

PTF Whistleblower Policy

It is the policy of the Partnership for Transparency Fund (PTF) to abide by all laws, rules and regulations applicable to it -- both in the United States (where its head office is located) and in each country worldwide in which civil society organization to which it makes grants operate -- and to conduct its activities in accordance with the highest ethical standards, as set forth in its Code of Business Conduct and Ethics. PTF takes seriously its obligation to prevent violations of legal provisions and ethical standards.

If an employee, consultant, director or volunteer or a member of the public believes that PTF -- through the acts of any of its employees, consultants, directors, volunteers or agents -- is in violation of applicable law or its ethical obligations (including any allegations of possible fraudulent or dishonest use or misuse of resources or property), such conduct should be immediately reported to an appropriate PTF manager (in the case of an employee, consultant, director or volunteer) or to the Chair of PTF's Audit and Governance Committee (in the case of a member of the public or an employee, consultant, director or volunteer not wishing to report the matter to a PTF manager). Such a report may be made in writing, by email or orally and should contain information sufficient for the manager or the Audit and Governance Committee fully to investigate the matter. Such reports may be made anonymously. Whistleblowers must be cautious to avoid baseless allegations.

All complaints made under this policy will be investigated as promptly and confidentially as possible. All PTF employees, consultants, directors, or volunteers and members of the public should act responsibly and truthfully in making allegations, responding to allegations, and providing information in an investigation.

PTF will use its best efforts to protect whistleblowers against retaliation. Whistleblower complaints will only be shared with those who have a need to know so that an effective investigation can be conducted to determine what action to take based on the results of such an investigation.

Information provided by a whistleblower shall be treated in confidence by PTF, subject to any legal obligation it may have to disclose such information to the police or other governmental authorities or in the course of legal proceedings.

PTF employees, consultants, directors and volunteers may not retaliate against a whistleblower for informing management or the Audit and Governance Committee about an activity which that person believes to be illegal, fraudulent, dishonest or unethical. Prohibited retaliation includes any action adversely affecting the terms or conditions of the whistleblower's employment, consultancy, directorship or volunteer service, including but not limited to, threats of physical harm, loss of job, punitive work assignments, or impact on salary or fees. Whistleblowers who believe that they have been retaliated against may file a written complaint with the Chair of the Audit and Governance Committee. Any complaint of retaliation will be promptly investigated and appropriate measures taken if the allegations of retaliation are substantiated. This protection from retaliation is not intended to prohibit managers from taking action in respect of an employee, consultant or volunteer based on valid performance-related factors.

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Contact Information for Reporting Information:
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[contact information updated May 4, 2018\