


Whistleblower Policy	Version: 1.0	
Creation Date: May 11, 2023	Last modified: May 11, 2023	

Whistleblower Policy

1. Objective

The Latin American Leadership Foundation (the “Organization”) is committed to the highest possible ethical standards in all of its practices, including compliance with all of its legal obligations. This Whistleblower Policy (the “Policy”) describes the process you can use, without fear of retaliation, to raise concerns about possible misconduct at the Organization. This Policy also aims to ensure that allegations of misconduct are reported and are investigated and dealt with in a thorough, confidential and prompt manner.

2. Purpose and context

No director, officer, employee, contractor, or volunteer (“Covered Person”) of the Organization who in good faith reports any action or suspected action taken by or within the Organization that is illegal, fraudulent, or in violation of any policy of the Organization, or who provides assistance to the Board of Directors of the Organization or any other person investigating such a report, will suffer intimidation, harassment, discrimination or other retaliation or, in the case of employees or contractors, adverse contract consequence.


3. Scope

This Policy is not an employment contract and does not modify the services or employment relationship between the Organization and its employees, contractors, or volunteers. Nothing in this Policy is intended to provide any Covered Person with any additional rights or causes of action, other than those provided by law.

4. General Guidelines and Principles

This Policy is designed to encourage and protect Covered Persons who report any of the following types of misconduct:

- Criminal or illegal acts
- Breaches of health and safety
- Unethical conduct connected with the workplace, including failure to comply with employee and contractor policies


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- Failure by the Organization to comply with its legal and regulatory obligations, including labor laws
- Discrimination or harassment
- Improper or questionable financial practices or accounting, internal control or audit activities
- Fraud or misuse of Organization resources
- Deliberate covering up of information relating to any of the above
- A retaliatory act against a Covered Person who reports any of the above

5. Procedures

Procedure for Reporting and Investigating the Misconduct:

1. Inform your immediate manager or supervisor, in writing, of your concerns.
2. If you believe that reporting the misconduct as provided in (1) above would not be appropriate under the circumstances, you may instead report the matter either directly to anyone in management you are comfortable approaching, directly to the Executive Director (the “Compliance Officer”), who is responsible for coordinating the investigation procedures and overseeing the resolution of all reported complaints concerning misconduct, or to the chair(s) of the board at boardchair@somoslala.org.
3. The Compliance Officer is tasked with administering this Policy and submitting a report detailing reported misconduct to the Board-designated committee in charge of overseeing compliance with this Policy or, if there is no such committee, to the Board of Directors. Any questions regarding the scope, interpretation or operation of this Policy should be discussed with the Compliance Officer. In a case where the Compliance Officer cannot handle the case due to conflict of interest, the CEO or a member of the board may handle the case.
4. Any information gathered in connection with the Compliance Officer’s submitted report will be kept in a protected digital file so that it is not generally available and will only be distributed to and seen by the Compliance Officer, the Board-designated committee and/or the Board of Directors, and other relevant parties who need access to this information for purposes of investigating the claim or administering this Policy.


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5. Your confidentiality will be maintained to the extent possible under the circumstances. The Organization, including its officers and directors, will not, unless compelled by judicial or other legal process, reveal to any other individual, entity or group, including any governmental, regulatory or law enforcement body, the identity of any individual who makes a report of misconduct, or provides assistance to the Compliance Officer investigating the reported misconduct and who, in each case, asks that his/her identity remain confidential.

6. Although you are not required to disclose your identity, in most cases doing so will make the report easier to investigate and resolve. If you would like to report anonymously, please use the [HR Anonymous Feedback Form](#). This form is only received by the HR team and escalated to the Chief Operating Officer or Board of Directors depending on the nature of the report. Anonymous complaints should be as detailed as possible because follow-up questions will not be possible.

7. During the investigation, the rights of everyone involved will be respected. However, the Organization will fully investigate the situation. If the investigation substantiates a report of misconduct by an officer, director, employee, or contractor, the appropriate corrective action will be taken, up to and including removal from the office or from the Board, termination of employment, or termination of the contract. All parties involved will be regularly informed of the progress. The person conducting the investigation will communicate his or her findings to any individuals under investigation and, if appropriate, to any relevant external authorities.

8. It is imperative that the investigation and information collected in connection with the investigation not be discussed with co-workers or anyone outside the Organization (other than a governmental, regulatory or law enforcement body). Representatives from management involved in the investigation will not disseminate results or information surrounding the investigation except to the relevant parties who have the need to know. Subject to legal constraints, you may receive information about the outcome of the investigation.

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6. Protection from Retaliation

If you make a report of misconduct in good faith and with reasonable grounds for believing that the misconduct has occurred, is occurring or will occur, you will be protected from retaliation. As long as you comply with this requirement, you will be protected even if the allegation is subsequently proven untrue. Any officer, director, employee, or contractor who retaliates against someone who has reported misconduct in good faith is subject to disciplinary action, up to and including removal from the office or from the Board, termination of employment, or termination of the contract.

However, any reports in bad faith which are made maliciously or are known to be false will be treated as misconduct and may result in disciplinary action, up to and including termination of employment, or termination of contract. Please also keep in mind that your right to be protected against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

7. Annexed Policies

None

8. Change Log

This is the section where all modifications and approvals of a policy are registered.

Version	Date	Modification	Editor	Approved by
1.0	May 11, 2023	Erika García	Alia Whitney-...	LALF Board of Directors on May 17, 2023