



INTERNATIONAL  
PARTNERSHIP FOR  
MICROBICIDES

# Whistleblower Policy

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# Whistleblower Policy

## Introduction

All “Covered Persons” (employees, directors, and others acting on behalf of the Organization) are expected to ensure that IPM complies with the highest standards of financial accounting and reporting and engages in lawful and ethical behavior with regard to the management of assets. IPM has developed guidance to remind staff of this expectation and encourages everyone to report concerns about possible violations. It is the policy of IPM to comply with all applicable legal and regulatory requirements relating to asset management, accounting, internal controls and auditing matters and to require its Covered Persons to do likewise.

Any staff member who knows or has a reasonable belief that persons associated with IPM, including but not limited to staff members, members of the Board of Directors or its committees and consultants, have engaged in or plan to engage in illegal or unethical conduct in connection with the organization’s resources or financial operations is expected to file a complaint with the Chief Executive Officer (CEO) and/or the Chair of the Finance Committee. If uncomfortable about raising the matter through the Organization’s normal reporting channels, they may want to seek assistance from this whistleblower policy.

It should be emphasized that this policy is intended to assist individuals who believe they have discovered misconduct or impropriety. It is not designed to question financial or business decisions taken by the organization nor should it be used to reconsider any matters which have been investigated under the harassment, grievance or disciplinary policies and procedures.

IPM will take appropriate action in response to any such complaints, including disciplinary action against any person who, in IPM’s assessment, has engaged in unethical conduct or misconduct and, where appropriate, will report such misconduct to the relevant civil or criminal authorities.

## What does this policy apply to?

This policy covers situations where an individual (the whistleblower) raises a concern about misconduct or wrongdoing or the risk of either that affects others such as clients, other employees, the organization or the public interest.

## What is whistleblowing?

Whistleblowing is the confidential disclosure by an individual of any concern encountered in the workplace relating to a perceived wrongdoing. The organization considers wrongdoing to include:

- General misconduct – such as immoral, illegal or unethical conduct
- Gross misconduct
- Potential infractions of IPM’s policies
- Potential infractions of audit (or other applicable) regulations
- Potential infractions of the codes of conduct

## **To whom does this policy apply?**

The policy applies to everyone who carries out work for the organization, including:

- All employees (full time or otherwise)
- Board Members or Advisors
- Contractors and sub-contractors
- Consultants
- Interns

## **What are the fundamental elements of this policy?**

- The whistleblower policy is established to provide procedures for (a) the receipt, retention, and treatment of complaints received by the Organization regarding accounting, internal controls, resources or auditing matters: and (b) the submission by Covered Persons and others, on a confidential and anonymous basis of good faith concerns regarding questionable matters.
- Any disclosures will be investigated fully including interviews with all relevant individuals and other parties involved.
- Any statement submitted by a Covered Person will remain confidential to the fullest extent possible, consistent with the need to conduct an adequate review of such statement, except as required by law or upon the advice of legal counsel. In addition, all written statements, along with the results of any investigations relating thereto, will be retained confidentially by the Organization.
- Anonymity: Normally individuals should make disclosures internally however this policy allows covered persons to express their views anonymously. The identity of the whistleblower will be protected at all stages in any internal matter. While the Organization can provide internal anonymity, it cannot guarantee this will be retained if external legal action flows from the disclosure. The organization is not responsible for maintaining anonymity where the whistleblower has told others of the alleged violation.
- The organization encourages a whistleblower to identify themselves. The effectiveness of any whistleblowing inquiry may be limited where an individual chooses not to be identified.

## **Process for dealing with whistleblower disclosures**

### ***Raising the concern***

Individuals may raise a concern through various channels including:

- Chief Executive Officer (CEO) **and/or**
- Chair of the Finance Committee
- Navex Global Hotline:  
Hotline Number: 844-252-3069 **and/or**  
URL Address: [ipmglobal.ethicspoint.com](http://ipmglobal.ethicspoint.com)

All whistleblowing disclosures made to the parties above will be treated as confidential. In addition, all reports from the hotline will be sent as they are available to the Chief Executive Officer (CEO) and Chair of the Finance Committee.

The whistleblower should make it clear that the disclosure is being made under the terms of IPM's whistleblower policy. This will ensure that the recipient of the disclosure realizes this and takes the necessary action to investigate the disclosure and to protect the whistleblower's identity.

Upon receiving a complaint, IPM will promptly conduct a thorough investigation. It is the obligation of all employees to cooperate in such investigation. IPM will try to maintain the

confidentiality of the allegations of the complaint and the identity of the persons involved, subject to the need to conduct a full and impartial investigation to remedy any violation of IPM's policies in compliance with legal obligations.

### **Possible outcomes after reporting a concern**

IPM will not take any action harmful to any staff member who:

- Reports a complaint in good faith, pursuant to this guidance, to law enforcement officers, governmental agencies or bodies, or persons with supervisory authority over the complainant.
- Provides in good faith information regarding a complaint to law enforcement officers, governmental agencies or bodies, or persons with supervisory authority over the complainant, or otherwise assists in any investigation conducted by IPM.
- Otherwise participates or assists in a proceeding filed or about to be filed. An individual who deliberately or maliciously provides false information may be subject to disciplinary action, up to and including termination of employment.

The following actions may be taken **after** investigation of the concern:

- Disciplinary action (up to and including termination) against the wrongdoer dependent on the results of the investigation; or
- Disciplinary action (up to and including termination) against the whistleblower if the claim is found to be malicious or otherwise in bad faith; or
- No action if the allegation proves unfounded

The whistleblower will be kept informed of progress and the outcome of the investigation, within the constraints of maintaining confidentiality or observing legal restrictions generally. A confidential record of the steps will be retained.

### **Frequently Asked Questions:**

What is the difference between whistleblowing and making a complaint?

- In practical terms, whistleblowing occurs when a worker raises a concern about issues of misconduct or infractions of policies that affects the organization or others (e.g. staff or others). The person blowing the whistle is usually not directly, personally affected by the action. Consequently, the whistleblower rarely has a personal interest in the outcome of any investigation into their concerns. As a result, the whistleblower should not be expected to prove their case; rather he or she raises the concern so others can address it. This is different from a complaint. When someone complains, they are saying that they have personally been poorly treated. This poor treatment could involve a breach of their individual employment rights or bullying and the complainant is seeking redress or justice for themselves. The person making the complaint therefore has a vested interest in the outcome of the complaint, and, for this reason, is expected to be able to prove their case.

Can concerns be raised confidentially or anonymously?

- Usually, the best way to raise a concern is to do so openly with senior management. Openness makes it easier for the Organization to assess the issue, work out how to investigate the matter, understand any motive and get more information. An individual raises a concern confidentially if he or she gives his or her name on the condition that it is not revealed without their consent. An individual raises a concern anonymously if he or she does not give his or her name at all. Clearly, if the Organization does not know who provided the information, it is not possible to reassure or protect them.

What information should a whistleblower provide?

- Supporting evidence for the allegations, if available, is clearly helpful. Individuals should talk to the Chief Executive Officer (CEO) and/or Chair of the Finance Committee or contact the Navex Global Hotline about their concern at the earliest opportunity rather than wait to collate any evidence.