



PADF Whistleblowing Policy

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Purpose and Scope

PADF is committed to lawful and ethical behavior in all its activities and requires that its management, employees, and consultants conduct themselves in a manner that complies with both the letter and the spirit of all applicable laws, as well as PADF organizational policies.

PADF has adopted a Whistleblower Policy to deter, expose, and address illegal or unethical conduct in connection with PADF.

PADF Commitments

PADF expects all employees and Partners to adhere to the highest standards of accountability, which requires honest and ethical conduct. PADF expects management to maintain a culture that supports and strengthens commitment to these high standards.

It is the responsibility of all employees to comply with PADF's ethical principles as contained in the Code of Conduct, Safeguarding Policy and to report immediately violations or suspected violations in accordance with this policy.

This policy is intended to encourage and enable employees and Partners to raise allegations of violations of PADF's Policies, waste and/or mismanagement of funds, abuse of authority, substantial and specific danger to public health and safety caused by PADF or its Partners, or violations of any law, rule, or regulation related to donor requirements, or other illegal conduct (collectively referred to herein as "Violations") in good faith, without the fear of retaliation, internally so that PADF can address and correct inappropriate conduct and actions.

PADF prohibits any act of retaliation against an employee who makes a good faith complaint of discrimination or harassment, or who cooperates in an investigation under this policy. This no-retaliation policy applies whether a good faith complaint of discrimination or harassment is well founded or ultimately determined to be unfounded.

No PADF manager or supervisor is authorized, or permitted, to retaliate or to take any adverse employment action whatsoever against anyone for reporting unlawful discrimination or harassment, for cooperating in an investigation of such conduct, or opposing any other discriminatory practice in the workplace.

PADF will not terminate, threaten, or discriminate against a supervisor, employee, or consultant in any manner because that person reported in good faith what they reasonably believed to be a violation of law or policy, or other unethical or illegal conduct or because they assist in an investigation of such alleged conduct. The right of a whistleblower to protection against retaliation does not include immunity for any personal wrongdoing.

Any employee who feels they have been retaliated against in violation of this no-retaliation policy, or who witnesses or learns of such retaliation, is responsible for reporting the retaliation in the same manner as any other form of discrimination or harassment.

PADF will impose disciplinary measures, up to and including termination of employment, against anyone who threatens or retaliates against a board member, employee, or consultant who makes such a good-faith report. Any whistleblower who believes they are being retaliated

against should contact the Chief of Staff or other member of the senior management team at headquarters immediately.

Processes and Procedures

Reporting

If you have knowledge of any misconduct or wrongdoing, you have a duty to report it, with facts and information sufficient to enable a thorough yet discreet investigation of the alleged activity. Reports should be made:

- Directly via email or telephone to the Chief Administration Officer at PADF Headquarters in Washington, D.C., or the Director of Talent Management at headquarters.
- If these senior leaders are involved, you should report directly to the Executive Director.
- You may also submit a concern directly to the PADF WhatsApp **+1(703)953-9241**.
- Call **0800 915 1571** or email through PADF's hotline, managed by Safecall, <https://www.safecall.co.uk/en/file-a-report/>, a third-party whistleblowing service provider. Service will be provided in the language of the country where your report originates. When you call the hotline, you may remain anonymous if you choose.
- Employment-related concerns should continue to be reported through normal channels, such as to the Human Resources Representative or Country Directors, or to PADF's Executive Director, Chief Administration Officer, or a senior member of the Talent Management team at headquarters. Alternatively, mail written documents to:
 - PADF Headquarters, 1889 F Street, N.W., 2nd Floor, Washington, D.C. 20006, USA.
Attn: Chief Administrative Officer

If the reports are safeguarding concerns, the Safeguarding Policy Framework describes additional reporting routes available for these concerns.

Education and Awareness

All Employees will be trained on the contents of this policy via PADF's mandatory Code of Conduct training.

All PADF offices will display posters on what to report and how, translated into the primary language of the office, in conspicuous locations where all staff will see them.

Partner Contractual Requirements

All PADF agreements with Partners will include a clause that requires the Partner to adhere to the substance of this policy and to communicate this policy to their staff.