# Oxfam America Whistleblower Protection Policy

## Summary:
The purpose of this policy is to outline the protection of whistleblowers and Oxfam America procedure for reporting such behavior.

## Policy: Implementation

A whistleblower is an employee who reports an activity that he/she considers to be illegal or dishonest. The whistleblower is not responsible for investigating the activity or for determining fault or corrective measures; Oxfam America management is charged with these responsibilities. Whistleblower protections are provided in two important areas—confidentiality and retaliation. It is Oxfam America’s policy that these protections apply to employees located anywhere in the world. If an employee has knowledge of or a concern of dishonest, illegal or fraudulent activity, the employee is expected to contact his/her manager or the Director of Human Resources. The employee must exercise sound judgment to avoid baseless allegations. An employee who intentionally files a false report of wrongdoing will be subject to discipline up to and including termination. Insofar as reasonably practical, Oxfam America may attempt to protect the confidentiality of the whistleblower in an effort to protect the employee from retaliation. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, poor work assignments, and threats of physical harm. Please note that in some instances, it may not be possible to maintain the confidentiality of the whistleblower and the identity may have to be disclosed to conduct a thorough investigation, to comply with affirmative disclosure requirements, applicable law and/or to provide accused individuals their legal rights of defense.

### Procedure

Any whistleblower who believes they are being retaliated against must contact the VP of People, Culture and Global Human Resources immediately. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

All reports of dishonest, illegal or fraudulent activities can be submitted via the Ethics Violation Reporting System link here:

https://oxfam.clue-webforms.co.uk/webform/misconduct/en

or by email at speakup@oxfamamerica.org

## Compensation:

### Applies to:
This policy applies to all Oxfam America employees, interns, volunteers, and contractors.

### Responsible Department:
Human Resources

## Associated Policies:

*Date: August 2021*