

Title	ETHICAL CONCERNS & DUTY TO REPORT			Policy #	HR032
Applies to	Headquarters, Other US Offices, and Field Offices			Origination date	5/02/05
Policy Owner	VP of Finance and Administration	Department	Risk Management	Effective date	5/02/05
This policy supersedes	NA			Next review date	6/5/21

Purpose

This policy supports Medical Teams International’s (MTI) commitment to a culture of integrity, ethical behavior, and accountability by maintaining an environment where representatives are required to timely report actual or suspected misconduct and freely able to raise good faith concerns. MTI representatives include directors, headquarter or country office employees, consultants, and volunteers.

Policy

Medical Teams International requires its directors, employees, consultants, and volunteers (also referred to as “MTI representatives”) to observe the highest standards of business and personal ethics in the conduct of their duties and responsibilities. It is the responsibility of MTI Management to maintain a system of controls which detect and deter all unethical, dishonest or illegal activities or financial improprieties. It is the responsibility of all MTI representatives to:

- comply with all applicable laws, governmental rules and regulations;
- report suspected activity involving MTI’s representatives that is a violation of local, state, or federal laws in the U.S. or in the country where the activity takes place; and
- report any concerns relating to sexual harassment or child abuse, or any other form of wrongdoing or questionable practices of any kind.

Supervisors and management have a special duty to recognize and report illegal, dishonest, or abusive conduct that they witness themselves, and to address complaints brought to their attention by others.

The expectation to report actual or suspected misconduct is absolute and for this reason representatives retain protection against retaliation for making a good faith report, raising a good faith concern and/or participating in an investigation of misconduct. Retaliation against any representative who brings forth a good faith concern, asks a clarifying question or participates in an investigation is prohibited. Knowingly making a false report, or reporting with malice or reckless disregard for the truth, is prohibited.

Representatives reporting suspected misconduct should take reasonable care to avoid violations of a person's rights under law, premature notice to persons suspected of misconduct and/or disclosure of suspected misconduct to others not involved with the investigation.

Definitions

Reporter: a director, headquarter or country office employee, consultant, volunteer or other representative of MTI who reports an activity that he/she considers illegal, dishonest, or constituting abuse to one or more of the parties specified in this policy. The reporter is not responsible for investigating the activity or for determining fault or corrective measures; appropriate management officials are charged with these responsibilities.

Good Faith Report: a report of suspected misconduct which is made without malice and which the person making the report has reasonable cause to believe is true.

Baseless Allegations: allegations made with reckless disregard for their truth or falsity. People making such allegations may be subject to disciplinary action and /or legal claims by individuals accused of such conduct.

Procedures**REPORTING SUSPECTED MISCONDUCT:**

Headquarters and County Office representatives should report suspected misconduct or illegal activity with someone who can address those concerns properly. When an MTI representative becomes aware of (or suspects) an impropriety, illegal or dishonest act, or abusive conduct, (etc.), he/she should report it immediately to his/her supervisor, department manager, HR manager, a trusted manager, or ethicspoint.com. Whenever possible, representatives should discuss the matter with their supervisor.

Minor offenses - If the concern is with the representative's direct supervisor and it is minor (e.g., isolated, yet offensive, off-color remark), they can request HR assistance or work it out between themselves.

Gross misconduct - If the concern is with the representative's direct supervisor and it is not minor, the representative should report the concern to any trusted manager. Representatives are not to investigate suspected misconduct on their own. Representative concerns may also be centrally reported directly to the Director of Compliance, the Director of Human Resources, or the Vice President of Finance and Administration. Field personnel should report to anyone in the field management structure, or any of the headquarter personnel mentioned above.

At Headquarters:

Supervisors/managers receiving a verbal or written report must ensure the issue is immediately reported in writing to either their Department Vice President, the Vice President of Finance and Administration, the Director of Compliance or the Director of Human Resources for guidance and support.

Within Field Offices:

Field supervisors/managers receiving verbal or written reports of suspected misconduct must ensure the issue is immediately reported in writing to either their direct supervisor, a trusted manager, or one of the headquarter Vice Presidents or Directors mentioned above.

ETHICS POINT:

MTI representatives may report suspected misconduct or illegal activity confidentially by calling our ethics hotline at 1.866.ETHICSP (1.866.384.4277) or through the hotline website at www.ethicspoint.com. The hotline is maintained by a third-party service to ensure confidentiality and proper handling of any reported violations and is available 24 hours a day, 7 days a week. Reports may be made anonymously through the hotline. It is helpful to provide information that can be investigated by the appropriate MTI personnel. MTI will investigate all reports promptly and confidentially to the extent possible with consideration given to:

- The seriousness of the issue raised;
- The credibility of the concern; and
- The likelihood of confirming the allegation from attributable sources.

CONFIDENTIALITY/RETALIATION:

Reporting protections are provided in two important areas – confidentiality and against retaliation.

Confidentiality - Insofar as possible, the confidentiality of the reporter will be maintained. However, MTI cannot guarantee confidentiality, and there is no such thing as an "unofficial" or "off the record" report. The reporter's identity may have to be disclosed to conduct a thorough investigation, to comply with the law and/or to provide accused individuals with an appropriate opportunity to respond.

Retaliation - MTI will not retaliate against a good faith reporter. 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, or threats of physical harm. Any reporter who believes he/she is being retaliated against must contact headquarters or country office HR, the Country Director/Manager, a trusted manager, the Department Vice President, or the Ethics Point hotline immediately. The right of a reporter for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated. Any personnel that retaliates against someone who has reported a violation in good faith is subject to discipline, up to and including termination of employment or service. This protection from retaliation is not intended to prohibit managers or supervisors from taking action, including disciplinary action, in the usual scope of their duties and based on valid performance-related factors.

Concerns or questions regarding this policy should be submitted to the Headquarters Director of Human Resources, or the Vice President of Finance and Administration.

Exceptions None

Related Legislation None

Related Policies None

Related Forms, Attachments, Waivers, Guidelines

References None

None

Revision History

Section(s) Changed/Description of Change(s) (Add to table for additional revisions)	Revised by (Name)	Date of Revision
V1 – Initial release of policy	n/a	n/a
V2 – Convert to new policy format	B. Bigoni	7/30/14
V3 – Policy updated with addition of duty to report.	D. Pearce	6/5/18

End of Policy