**Whistleblower Policy**

The whistleblower policy is intended to provide a mechanism for the reporting of illegal activity or the misuse of Seeds of Hope International Partnerships, Inc. assets while protecting donor, volunteer or employee who make such reports from retaliation.

This policy is designed to address situations in which a donor, volunteer or employee with the organization suspects another volunteer or employee has engaged in illegal acts or questionable conduct involving Seeds of Hope International Partnerships' assets. This conduct might include outright theft (of equipment or cash), fraudulent expense reports, misstatements of any accounts to any manager or to Seeds of Hope International Partnerships' auditors, or even a volunteer's conflict of interest that results in financial harm to Seeds of Hope International Partnerships.

Seeds of Hope International Partnerships encourages donors, and our employees and volunteers to report such questionable conduct and has established a system that allows them to do so anonymously.

If a donor, volunteer or employee suspects illegal conduct or conduct involving misuse of Seeds of Hope International Partnerships assets or in violation of the law, he or she may report it, anonymously and will be protected against any form of harassment, intimidation, discrimination, or retaliation for making such a report in good faith.

Employees and volunteers can make a report via phone, email, or snail mail to any of the following Seeds of Hope International Partnerships representatives at any time: Board of Directors or Executive Director.

Seeds of Hope International Partnerships will promptly conduct an investigation into matters reported, keeping the informant's identity as confidential as possible consistent with our obligation to conduct a full and fair investigation.

A donor, volunteer or employee who has made a report of suspicious conduct and who subsequently believes he or she has been subjected to retaliation of any kind by any Seeds of Hope International Partnerships employee or volunteer is directed to immediately report it to the organization's Board of Director President, or Executive Director as appropriate.

Reports of retaliation will be investigated promptly in a manner intended to protect confidentiality as much as practicable, consistent with a full and fair investigation. The party conducting the investigation will notify the donor, volunteer or employee of the results of the investigation.

Seeds of Hope International Partnerships strongly disapproves of and will not tolerate any form of retaliation against donors, employee or volunteers who report concerns in good faith regarding Seeds of Hope International Partnerships' operations.

Any volunteer or employee who engages in such retaliation will be subject to discipline up to and including termination of service.

The “whistleblower” procedure is intended to describe the process through which concerns about the possible misuse of Seeds of Hope International Partnerships assets are handled pursuant to Seeds of Hope International Partnerships’ whistleblower policy.

1. A donor, volunteer or employee makes a report of suspected misuse of Seeds of Hope International Partnerships assets by reporting via phone, email, or snail mail to the Seeds of Hope International Partnerships United States office, or reporting anonymously to the Board of Director President or another Board of Director member.

2. The report is promptly reviewed by the Executive Director, as well as the Board of Director President, to determine whether the report constitutes a complaint or a non-complaint, unless one of them is allegedly involved in the misconduct, in which case the report should be reviewed by only one of them. (If both of them are alleged to be involved, the report should go directly to the Board of Directors Treasurer or Secretary.)

A ***complaint*** means any report involving (i) questionable accounting, auditing, financial reporting, or internal controls; (ii) suspected fraud, theft, or improper use of company assets; (iii) a violation of Seeds of Hope International Partnerships’ conflict-of-interest policy that results in a financial harm to Seeds of Hope International Partnerships; or (iv) a claim of retaliation against any donor, volunteer or employee making a good-faith report regarding any of the preceding matters.

A ***non-Complaint*** means a report of any other matter not involving a misuse of Seeds of Hope International Partnerships’ assets.

3. If the report is deemed to be a complaint, it will be promptly investigated and forwarded to the Board of Director members. If the report is deemed to be a non-complaint, it will be referred to the appropriate executive or manager for follow-up. Some non-complaints may involve serious matters and may require prompt investigation, but may nevertheless not involve misuse of Seeds of Hope International Partnerships’ assets.

4. Each complaint is fully investigated, and as far as possible handled so as to protect the privacy of the donor, volunteer or employee making the complaint. A written report of the outcome of each investigation is prepared and delivered to the Board of Director.

5. The Board of Directors President decides whether the report involves a matter that is material. If it is deemed material, it is reviewed by the full Board, or may direct Executive Director to take actions to resolve the situation. If the report is deemed nonmaterial, it is not reviewed by the Board of Directors but is instead addressed by the Board of Directors President and Executive Director as appropriate.