

ICNA RELIEF USA PROGRAMS, INC.

WHISTLE BLOWER POLICY

General Policy

All employees, directors and officers of ICNA Relief USA will be protected from any disadvantage caused by raising legitimate concerns and shall report suspected illegal activities within an organization.

Purpose

ICNA Relief USA encourages its employees, directors and officers to maintain high ethical standards. This whistleblower policy is meant to provide a confidential and effective means for reporting suspected violations of the law. It further serves to protect individuals who report suspected violations from retaliation in any form.

SAFEGUARDS

Confidentiality

An individual may report a suspected violation anonymously or on a confidential basis, keeping in mind that in the course of the investigation it may become necessary that the source of the complaint be identified.

Retaliation

No individual who reports a suspected violation in good faith, whether or not the allegations turn out to be correct, shall be subject to any form of retaliation, including harassment, demotion, or firing, by ICNA Relief USA or its employees. Anyone who retaliates against a complainant shall be subject to disciplinary action.

ICNA Relief USA will not retaliate against employees who disclose or threaten to disclose to a supervisor or a public body, any activity, policy, or practice of ICNA Relief USA that the employee reasonably believes is in violation of a law, or a rule or regulation mandated pursuant to law, or is in violation of a clear mandate or public policy concerning the health, safety, welfare, or protection of the environment.

Malicious Allegations

An individual is not required to prove the truth of an allegation, but it is required to act in good faith. Any individual who does not act in good faith in reporting a suspected violation may be subjected to disciplinary action.

PROCEDURE

Open Door Policy

If an employee reasonably believes that some policy, practice or activity of ICNA Relief USA is in violation of the law, or a clear mandate or public policy, the employee should share their questions, concerns, suggestions, or complaints with someone who may be able to address them properly. If the concerns are not addressed, the individual should make a formal complaint as outlined below.

Reporting Violations

If an individual reasonably believes that some practice of ICNA Relief USA, or another board of directors or a board committee, an employee of [Nonprofit], or another individual or entity with whom ICNA Relief USA has a business relationship is in violation of the law, the employee must file a written complaint with the Executive Director or Board President.

Handling Reported Violations

The Executive director or Board President will contact the complainant within 10 business days and acknowledge the reported violation was received. The complainant will be notified about what actions will be taken. If no further action or investigation is to follow, an explanation for the decision will be given to the complainant.

Any complainant who reasonably believes they have been retaliated against in violation of this whistle blower policy shall follow the same procedures as they did when they filed the original complaint.

My signature below indicates my receipt and understanding of this policy. I also verify that I have been provided with the opportunity to ask questions about the policy.

Employee Signature

Date