

CODE OF CONDUCT

INTRODUCTION:

Discrimination, harassment, retaliation, abuse of authority and bullying violate Forum for Safe Motherhood's values and threaten its credibility as an organization. They are unacceptable in the workplace itself and in other work-related settings such as business trips, board meetings, social events and similar situations connected with work. Such behavior is also prohibited whether it is conducted in person or virtually. Everyone at the Forum is entitled to work in a safe, professional environment and to be treated with dignity and respect.

Everyone at the Forum is responsible for creating an environment free of harassment, discrimination, retaliation, abuse of authority, and bullying. No employee or board member is exempt from the requirements of this Code of Conduct, regardless of their position in the organization.

The Code of Conduct applies to Forum staff and board members. It also applies to any other individual who has a relationship with the Forum that enables the organization to exercise some level of control over that person's conduct in places and activities that relate to its work. This includes staff employed by any of Forum's affiliate, outside vendors, donors, consultants, contractors, and others. Forum does not tolerate behavior that violates Code of Conduct whether it is committed by employees against non-employees, or by non-employees against employees.

Forum for Safe Motherhood will support its staff if they are the Target of behavior that may violate this Code of Conduct no matter where in the world that behavior occurs, and no matter who is accused of the behavior. An employee who believes they are the Target of behavior that may violate this Code of Conduct is encouraged to report that behavior, even if the Accused is employed by an entity other than the Forum. Once Forum receives that report, the organization will investigate and coordinate with the entity that employs the Accused. As in any situation in which a Forum's staff member is a Target, when a complaint involves an individual from an entity other than the Forum, Forum's priority will be (a) to support its staff member and (b) to ensure the behavior stops and does not reoccur.

Forum will investigate every complaint promptly and thoroughly. Any violation of this Code of Conduct will be treated with utmost seriousness whether it is a singular incident or a pattern of behavior.

This Code of Conduct must not be used as a basis for excluding or separating individuals of a particular gender, or any other protected characteristic, from participating in business or work-related activities or discussions in order to avoid allegations of discrimination, harassment, retaliation, abuse of authority, or bullying.

Terms & Definitions:

In this Code of Conduct, the following terms apply:

- Accused: An individual accused of behavior that may violate this Code of Conduct.
- Target: An individual who experiences behavior that may violate this Code of Conduct.

- **Discrimination:** The treatment of one individual differently than another because of that individual's membership in, or affiliation with, a protected category, or that of the individual's relatives, friends, or associates.
- **Harassment:** Conduct that denigrates or shows hostility or aversion toward an individual because of that person's membership in, or affiliation with, a protected category, or that of the individual's relatives, friends, or associates, and that (i) has the purpose or effect of creating an intimidating, hostile or offensive work environment, (ii) has the purpose or effect of unreasonably interfering with an individual's work performance, or (iii) otherwise adversely affects an individual's employment opportunities.
- **Retaliation:** A punitive or negative response to an individual's assertion of their right to be free from behavior that violates this Global Code of Conduct, or to participate in an investigation into such behavior.
- **Sexual Harassment:** Sexual harassment is one form of harassment, and a form of sexual violence. It includes unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when that conduct explicitly or implicitly affects an individual's employment, unreasonably interferes with an individual's work performance, or creates an intimidating, hostile, or offensive work environment. There are two primary types of sexual harassment:
 - **Quid pro quo harassment:** in which submission to or rejection of unwelcome sexual conduct by an individual is used as the basis for employment decisions affecting that individual; and
 - **Hostile environment harassment:** unwelcome sexual conduct that unreasonably interferes with an individual's job performance or creates an intimidating, hostile, or offensive working environment.
- **Abuse of Authority:** Abuse of authority entails the improper use of a position of influence, power, or authority by an individual against a colleague or group of colleagues.
- **Bullying:** Bullying is typically understood as repeated incidents or patterns of behavior that are intended to intimidate, offend, degrade, or humiliate a particular person or group of people. Bullying is an assertion of real or perceived power through aggression.

DISCRIMINATION IS PROHIBITED

Discrimination contradicts the very nature of Forum's movement and violates the principles it stands for. Discrimination of any kind is illegal, and is prohibited at the Forum. Discrimination occurs when a person treats one individual differently than another because of that individual's membership in, or identification with, a protected category, or that of the individual's relatives, friends, or associates.

Protected categories include:

- Age;
- Family responsibilities: supporting a person in a dependent relationship which includes, but is not limited to, children, grandchildren, parent;
- Gender, gender identity, gender expression, transgender status or sexual stereotypes including behavior, appearance, expression or behavior that may be different than what you were assigned at birth;

- Marital status;
- Matriculation: being enrolled in college, university or some type of secondary school;
- Nationality, immigration status, citizenship or ancestry;
- Perceived or actual, past or present, physical, mental, learning or intellectual impairment that substantially limits one or more major life activities, genetic information or characteristics, and HIV/AIDS status;
- Political views or activity;
- Race, color, ethnic or national origin;
- Religion or religious creed or belief;
- Sex, including pregnancy, childbirth, breastfeeding, reproductive health decisions, or related medical conditions;
- Sexual orientation;
- Status as a survivor or family member of a survivor of domestic violence, a sexual offence or assault, or stalking;
- Veteran status; and
- Any other basis protected by applicable national or local laws.

If an employee believes that he has been the Target of discrimination, he is strongly encouraged to report the incident using the procedures described below. Forum will investigate each report promptly, thoroughly, and impartially. Any retaliation against a person who reports behavior they believe is discriminatory or participates in an investigation into that behavior is strictly prohibited.

HARASSMENT IS PROHIBITED

Harassment is a form of discrimination. Harassment is unwelcome conduct directed towards a person because of that person's membership in, or affiliation with, a protected category or that of the individual's relatives, friends, or associates. Harassment is unlawful when:

- Enduring the offensive conduct becomes a condition of continued employment, or
- The conduct is severe or pervasive enough to create a work environment that a reasonable person would consider hostile, intimidating, or abusive.

Forum is committed to stopping, preventing, and correcting this behavior before it becomes severe or pervasive. Therefore, offensive behavior may violate this Code of Conduct even if it does not meet the legal definition of harassment.

Harassment can range from extreme behaviors, including violence, threats, or physical touching, to less obvious acts like ridiculing, teasing, repeatedly bothering individuals, or offering opportunities to one individual but not another based on a protected characteristic. Examples of harassment include, but are not limited to:

- accessing offensive materials online during work time;
- accessing offensive materials online using Forum's equipment;
- behavior perceived to be punitive in nature, such as ignoring;
- derogatory or insensitive jokes, pranks, or comments;
- derogatory statements not directed at the Target but that take place within their hearing;
- derogatory, offensive, demeaning, or belittling comments about an individual or one or more people;
- displaying or sharing belittling or demeaning images, objects, or written materials;

- innuendos or veiled threats;
- laughing at, ignoring, or otherwise retaliating against an employee who complains about harassing behavior’;
- microaggressions;
- non-verbal behavior such as staring, leering, or gestures;
- ridiculing or demeaning comments;
- slurs or epithets;
- teasing, mimicking, or repeatedly commenting on an individual’s disability, accent, or other protected characteristic; and
- unnecessary or unwanted physical contact.

These are only examples and is not an exhaustive list of behaviors that may be considered harassment at the Forum. Behaviors such as these violate Forum’s values whether they are spoken or written and whether they occur within the workplace or in any other work-related setting, such as during business trips, business meetings, organization-led social events, or on social media.

If an employee believes that he has been the Target of harassment, he is strongly encouraged to report the incident using the procedures described below. Forum will investigate each report promptly, thoroughly, and impartially. Any retaliation against a person who reports behavior they believe is discriminatory or participates in an investigation into that behavior is strictly prohibited.

SEXUAL HARASSMENT IS PROHIBITED

Sexual harassment of any kind is never tolerated at the Forum. It directly contradicts the organization’s mission and values and is also illegal. Like other forms of harassment, sexual harassment can be extremely harmful, both to the persons subjected to it and those who witness it, and to the achievement of Forum’s goals. We are committed to intervening as early as possible to stop, prevent, and correct this behavior.

Sexual harassment occurs when one person makes unwelcome sexual advances, requests for sexual favors, or other verbal or physical acts of a sexual nature to another if that conduct:

- creates an intimidating, hostile, or offensive work environment;
- explicitly or implicitly affects an individual’s employment; or
- unreasonably interferes with an individual’s work performance.

Sexual harassment can be physical, visual, verbal, or nonverbal in nature. It includes non-sexual behaviors such as statements that demonstrate harassment on the basis of a person’s sex status, regardless of whether any sexual innuendo is used. This type of harassment occurs, for example, if a person is harassed either for exhibiting what is perceived as stereotypical characteristics of their sex, or for failing to conform to stereotypical notions of masculinity, femininity, or other non-binary gender identity as determined by the individual only.

Sexual harassment can happen between persons of the same sex or gender, or persons of different sex or gender. Just like other forms of harassment, sexual harassment can occur through social media, the internet, and over phones and other devices. Forum recognizes that sexual harassment is a manifestation of power relationships and often occurs within unequal

relationships in the workplace, for example between director or supervisor and employee. However, sexual harassment – just like other forms of harassment – can also occur between co-workers or between an employee and a nonemployee.

It is not possible to list all behaviors that may constitute sexual harassment. Whether or not a particular behavior constitutes sexual harassment will depend upon the particular circumstances. However, any of the following examples may constitute sexual harassment if the behavior is based on an individual's sex (including that person's gender, gender expression, gender identity, transgender status, etc.):

- assault or coerced acts;
- conducting prohibited behaviors online, over text, on social media, and the like;
- continuing prohibited behavior after a coworker has objected;
- direct or implied requests for favors in exchange for actual or promised job benefits such as favorable reviews, salary increases, promotions, increased benefits, or continued employment;
- displaying suggestive objects, pictures, photographs, or cartoons;
- language that is humiliating to an individual on the basis of their gender identity, expression;
- making or threatening reprisals after a negative response to advances;
- unwelcome advances, flirtations, or propositions – whether they involve physical touching or not;
- unwelcome leering or whistling;
- unwelcome or suggestive comments, jokes, teasing, or gossip including, but not limited to, comments about an individual's appearance, sexual activities, experience, deficiencies, or prowess;
- unwelcome physical contact such as patting, grabbing, massaging, pinching, brushing against the body, impeding or blocking movement, or making gestures; and
- using terms of endearment such as honey, babe, or stud when referring to co-workers.

Forum is committed to stopping this behavior before it becomes severe or pervasive and to creating a culture that is free of sexual harassment. Therefore, if an employee believes that he has been the Target of sexual harassment, he is strongly encouraged to report the incident using the procedures described below. Forum will investigate each report promptly, thoroughly, and impartially. Any retaliation against a person who reports behavior they believe is discriminatory or participates in an investigation into that behavior is strictly prohibited.

ABUSE OF AUTHORITY AND BULLYING ARE PROHIBITED

Forum does not tolerate abuse of authority or bullying. Abuse of authority entails the improper use of a position of influence, power, or authority by an individual against a colleague or group of colleagues. Bullying is typically understood as repeated incidents or patterns of behavior that are intended to intimidate, offend, degrade, or humiliate a particular person or group of people. Bullying is an assertion of real or perceived power through aggression. Any person at any level of the organization may be a bully or the Target of bullying behavior.

The following examples may constitute abuse of authority or bullying if they are sufficiently serious or demonstrate a pattern of behavior:

- asking a subordinate to cover up for unauthorized absences in exchange for promised or implied favors;
- belittling a person's opinions;
- blocking applications for training, leave, or promotion without justification;
- criticizing a person persistently or constantly;
- intentionally excluding someone from normal workplace conversations and making them feel unwelcome;
- intruding on a person's privacy by pestering, spying, or stalking;
- physical abuse or threatening abuse;
- spreading malicious rumors, gossip, or innuendo;
- tampering with a person's personal belongings or work equipment;
- unwarranted or undeserved monitoring and/or punishment;
- using workplace resources to threaten, harm, intimidate, embarrass, or otherwise harm another person;
- withholding necessary information or purposefully giving incorrect information; and
- yelling or use of profanity.

The following are examples of behaviors that do not constitute bullying:

- expressing differences of opinion;
- offering constructive feedback, guidance, or advice about work-related behavior; and
- reasonable action taken by a supervisor relating to the management and direction of staff or the place of employment (e.g., managing performance, taking reasonable disciplinary actions, or assigning work).

If an employee believes that he has been the Target of bullying or abuse of authority, he is strongly encouraged to report the incident using the procedures described below. Forum will investigate each report promptly, thoroughly, and impartially. Any retaliation against a person who reports behavior they believe is discriminatory or participates in an investigation into that behavior is strictly prohibited.

RETALIATION IS PROHIBITED

Forum prohibits retaliation against any employee who participates in good faith in the processes outlined in the Code of Conduct. Retaliation occurs when a person is penalized for engaging in certain activities ("protected activities") including, but not limited to:

- answering questions during an investigation into an alleged violation of this Code of Conduct;
- asking directors or co-workers about salary information to uncover potentially discriminatory wages;
- assisting another employee in an effort to report a potential violation of this Code of Conduct;
- expressing an intent to report what they believe to be a violation of this Code of Conduct;
- filing or being a witness in a charge, complaint, investigation, or lawsuit relating to a violation of this Code of Conduct;

- refusing to follow orders that would result in discrimination, harassment, abuse of authority, or bullying;
- reporting behavior they believe to be a violation of this Code of Conduct, including communicating with a supervisor about discrimination, harassment, abuse of authority, or bullying;
- requesting accommodation because of a disability or for a religious practice; and
- resisting sexual advances, or intervening to protect others.

Some behaviors that may be retaliatory, if they are conducted in response to the types of activities listed above, include but are not limited to:

- blocking advancement or other employment opportunities;
- disclosing information the employee otherwise keeps private, such as immigration status or sexual orientation;
- excluding the employee from decisions or activities;
- failing to award an employee a raise or bonus;
- isolating the employee;
- negatively impacting the employee's terms or conditions of employment (e.g., increased hours, less pay, demotion, reassignment, reduction in responsibilities);
- poor evaluations; and
- removing perks granted to other, similarly situated employees.

Retaliation is illegal and it is absolutely prohibited at the Forum. If an employee makes a report or participates in another protected activity and believes that he is retaliated against as a result, he is strongly encouraged to report the behavior using the procedures described below. Each report of retaliation will be investigated promptly, thoroughly, and impartially. Any person – no matter their level of seniority – who retaliates against another will be subject to discipline, up to and including termination.

INFORMAL RESPONSES TO OFFENSIVE BEHAVIOR

If an employee believes that he has been the Target of conduct prohibited by this Code of Conduct, and he feels comfortable doing so, he may choose to communicate directly with the individual engaging in that conduct, informing them that their behavior is unacceptable and that it should be stopped.

Forum recognizes that it is not always easy to directly confront the Accused. If an employee chooses to pursue this option, it is often helpful to plan what is to be said, how it is to be said, and where and when to have the conversation. Alternatively, the employee might choose to write a letter or email to the Accused, describing the behavior he finds to be offensive and asking him to stop.

Employees are not required to engage directly with the Accused and, even if they choose to do so, they are still encouraged to report the behavior to the Forum using one of the procedures outlined here. Reporting the incident will allow the Forum to support the concerned employee fully, ensure that the unwelcome behavior ceases, and prevent its future recurrence. Once informed, the organization can also make sure that the employee does not experience any retaliation – whether for making the report and participating in the investigation, or for responding directly to the wrongdoer.

REPORTING A CONCERN

Anyone can report behavior they believe may violate the commitments and standards Forum has set in this Code of Conduct, including behavior of employees and nonemployees anywhere in the country. All staff members are strongly encouraged to do so.

Forum absolutely prohibits retaliation against any person who, in good faith, makes a report or participates in an investigation. Any reported retaliation will be investigated and addressed promptly and thoroughly in accordance with the procedures detailed below.

It is important that employees have resources available to file a complaint in a manner that they are comfortable with. Forum has designated individuals who are accountable for receiving complaints filed and ensuring prompt investigation and appropriate action. Employees are encouraged to file complaints of behavior believed to be in violation of this Code of Conduct directly with these individuals by phone, in writing or in person. An employee may decide whether he wishes to identify himself as the complainant or not.

- **Discussion with Supervisor.** Employees may be most comfortable discussing the behavior believed to be in violation of this Code of Conduct with their direct supervisor in advance of filing a complaint, or as a source of support for filing a complaint.
- **The National Coordinator (NC).** Employees may file a complaint with the NC, who is required to report this information on their behalf, but not required to provide their name.
- **CEO.** Employees may file a complaint with the CEO who will take appropriate action to initiate an investigation.

If an employee experiences conduct that he believes is contrary to this Code of Conduct, or has witnessed that conduct, he is strongly encouraged to report the incident promptly. Prompt reporting will allow Forum to provide active support to the employee and respond and address the behavior before it becomes severe or pervasive.

It is important that complaints filed include specific, actionable information that can be used during the course of the investigation. An employee should include key details to support an effective investigation to the extent that he is comfortable:

- Date of Report;
- Date(s) of Incident;
- Description of the incident(s) that is in violation of this Code of Conduct. Descriptions should be fact based and include as many relevant details as possible;
- If the employee is a witness, please try to make the report from one's own perspective and not presume the experience of others;
- Name of Accused;
- Name of Target;
- Specific Location of Incident;
- Witnesses and Potential Witnesses; and
- Name (if the employee chooses to provide it)

Employees can use one of the reporting avenues above whether the conduct he experienced occurred in the country or internationally. Employees are encouraged to make a report even if the behavior involves individuals from other entities, or individuals who are not employed by the Forum.

INVESTIGATIONS – WHAT TO EXPECT

Forum will investigate all reports whether the complaint conforms to a particular format or is made verbally or in writing. Every report of discrimination, harassment, retaliation, abuse of authority, and bullying will be investigated promptly, thoroughly, and impartially by a qualified Investigator. In most instances, Forum's National Coordinator will serve in the role of Investigator, however, this determination will be made on a case by case basis to ensure an appropriate person is appointed to objectively assess each situation and make recommendations to the Review Panel.

All Forum staff members are required to cooperate and provide truthful information in an investigation. All individuals involved in the investigation – including the Target, the Accused, and any witnesses or interviewees – will be treated with respect and dignity. When participating in an investigation, there are several things you can expect:

Beginning of the Investigation

If the employee chooses to provide his name, the Investigator will reach out to him within three (3) business days from receiving the complaint report. In that initial contact, the Investigator's primary goal is to ensure the employee's wellbeing. The Investigator will provide information regarding staff support resources and discuss with the employee any arrangements necessary to ensure his safety and wellbeing. During this initial contact, the Investigator will also discuss with the employee the investigation process and confirm relevant details as outlined by the employee.

During the Investigation

Throughout the investigation, the Investigator will conduct individual interviews with the parties involved and, where necessary, with individuals who may have observed the alleged conduct or have other relevant knowledge. Prior to a meeting, the Investigator will contact the concerned by email to coordinate schedules. As outlined, every effort will be made to ensure confidentiality of investigations. All Forum's staff members are required to participate in the investigative process if asked.

There will likely be two Investigators in the meeting with the employees. One will be there to take notes. The employee will be asked a variety of questions about a particular topic. It is important that the employee is open and honest and provides as much detail as possible in his responses. If there are particular individuals an employee believes the Investigator should speak with, these may identify them. The employee may also recommend particular questions to be asked of those individuals. However, the final decision of who to interview and what questions to ask is in the discretion of the Investigator(s). If allegations have been made against an employee, he will be advised of them during the meeting and given an opportunity to respond.

Following the Investigation

Once the investigation is completed, the Investigator will draft a confidential report summarizing the investigation's findings. The Review Panel will be comprised of the CEO and other members of the Board of Directors. They will review the investigation report and determine whether a violation of Code of Conduct has occurred. The Review Panel will make an appropriate determination as to the sharing of this information based on essential business need for the information.

In making its determination, the Review Panel will analyze, among other things, whether a reasonable person would find the environment or behavior hostile, abusive, or unacceptable, as well as whether the Target viewed it as such. This determination will be based on both subjective and objective factors, considering the totality of the circumstances surrounding the alleged incident, including, without limitation, the frequency, duration and severity of that conduct.

The Review Panel will determine the appropriate responsive action based on all facts and circumstances uncovered during the investigation. While the criteria used to determine responsive action will vary for each unique set of circumstances, in all cases responsive action will be designed to meet three (3) criteria.

1. The severity of the responsive action is appropriate to the severity of the behavior the employee is found to have conducted.
2. The responsive action is sufficient to end the behavior that is in violation of this Code of Conduct.
3. The responsive action is consistent with previously imposed action(s) for similar conduct by other employees.

Based on the results of the investigation, responsive actions may include, but are not limited to, mediation between the parties if it is considered an appropriate path to resolving the issue and can be done in a manner that feels safe for all involved, training, required coaching, verbal and written warnings, withholding of a promotion or pay increase or bonus, reassignment, temporary suspension without pay, and/or dismissal. Other responsive actions may be implemented as appropriate, depending on particular circumstances.

Forum will follow guidance for responsive action as outlined in this Code of Conduct, but some common factors considered in making this determination include:

- The immediate physical and emotional safety of Forum's employees;
- Whether the individual is a present or potential risk to the organization;
- The seriousness of the actions that the Accused is found to have committed;
- Facts and circumstances, derived from the investigative process, including preceding events, complete context and evidence provided;
- Accused employee's response, including comprehension of the allegations and or Code of Conduct violation, demonstrated commitment to correct the behavior, complete responsive action requirements (mediation, training, required coaching, etc.) and evidence provided during the investigative process; and
- Employee history of behavior, including patterns of conduct, disciplinary action and/or complaints.

Following the Review Panel's determination, a written copy of the disciplinary decision will be provided to the Accused. The Review Panel is responsible for implementing the disciplinary actions chosen in a timely manner. The Investigator will also reach out to the Target to inform them that the matter has been investigated, addressed and concluded. To protect confidentiality and ensure fairness to everyone involved, Forum may not be able to provide specific details about an investigation or its outcome.

As a general rule, Forum will endeavor to complete its investigation within sixty (60) days of receiving a complaint. If an investigation takes longer than thirty (30) days, the Investigator will inform the Review Panel and the Target. If an employee needs support at any point prior to, during, or after an investigation, he may contact any of the individuals designated as resources above.

APPEAL OF THE DECISION

If the Accused is dissatisfied with the decision of the Review Panel, he may appeal the decision. Appeals may be directed to the CEO and must be done in writing and within five (5) business days.

All complaints and appeals will be taken seriously. The appeal document will be considered carefully and in relation to the evidence and information obtained during the investigation. It may be required for additional interviews to take place, with the Accused and others, before a final determination is made. If an employee fails to appeal within the time limits set forth above, the problem should be considered settled on the basis of the last decision, and the problem should not be subject to further consideration. Exceptions to the timeline will be extended for individuals who are traveling.

INTENT

In order for Forum to take actions necessary to cultivate a workplace culture that is respectful, safe and inclusive it is critical to be informed of behavior that is in violation of this Code of Conduct. All staff who, in good faith, believe they have witnessed or experienced behavior in violation of this Code of Conduct should come forward even if he is unsure if something meets the criteria. No employee will ever be penalized for filing a complaint that is not found to have merit as long as the complaint was filed with honest intention.

Under no circumstances will Forum tolerate filing of complaints with malicious intent – complaints known to be false, filed to discredit or otherwise harm another individual. All complaints will be presumed to be in good faith until and unless contradictory information becomes available.

TRANSPARENCY AND CONFIDENTIALITY OF COMPLAINTS AND INVESTIGATIONS

Forum understands that every staff member – including those who report behavior they believe violates this Code of Conduct, those who are accused of such behavior, and those who witness the behavior – has a need for confidentiality and autonomy. Forum cannot guarantee absolute confidentiality. However, disclosure of information will be made on a strict need-to-know basis based on the obligations, legally and to our employees, to investigate and take prompt responsive action. For example, to fully investigate and respond to a complaint,

disclosures may have to be made to particular individuals including, but not limited to, the Review Panel, the Accused, and individuals interviewed as part of the investigation.

At the close of an investigation, the Investigator will reach out to the individuals involved to inform them that the matter has been addressed and closed. However, to protect confidentiality, the Investigator may not be able to provide details, such as particular discipline implemented, or responsive actions taken.

All persons involved in an investigation are asked to do everything reasonably possible to keep the investigation confidential. Confidentiality allows the organization to preserve the integrity of the investigation, to ensure fairness to all involved, and to protect the privacy of employees who have brought complaints or who are accused of wrongdoing. This request for confidentiality is not meant or intended to curtail employees' rights under the law to discuss work related matters but rather to protect all employees involved, including active prevention against retaliation.

All records collected or created during the investigation will be housed in Forum's confidential files. Access to these files will be limited strictly to the Investigator, CEO and members of Board of Directors.

HOLDING OURSELVES ACCOUNTABLE

Investigators are required to report all claims, allegations and complaints received, to the CEO or Directors within twenty-four (24) hours of receipt. Investigations, outcomes and follow up actions will also be shared with these persons.