

# Integrity Protection Policy

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## PURPOSE

Global Water Center expects all employees to observe high standards of integrity and comply with all applicable laws. Global Water Center (GWC) requires all corporation representatives, including directors, officers, and employees, to observe high standards of integrity and accountability to maintain our values and comply with all laws.

## POLICY

The Integrity Protection Policy is implemented to protect the corporation from internal control, financial, accounting irregularities or wrongdoing, sexual misconduct, discrimination, and other breaches of GWC's Code of Conduct. GWC is committed to the highest possible standards of ethical, moral, and legal conduct in the operation of the corporation. All reports of illegal and dishonest activities will be promptly submitted to human resources and/or executive leadership who is responsible for investigating and coordinating corrective action.

## Definition and Example

An integrity protector as defined by this policy is an employee, volunteer, contractor, or representative of GWC who reports an activity that they consider to be illegal or dishonest to one or more of the parties specified in this policy. The integrity protector is not responsible for investigating the activity or for determining fault or corrective measures; appropriate management officials are charged with these responsibilities.

Examples of illegal or dishonest activities could include, but not limited to, violations of federal, state, or local laws, billing for services not performed or for goods not delivered, other fraudulent financial reporting, sexual misconduct, sexual harassment.

## Reporting

If any person knows of or has a suspicion about misconduct, dishonesty, or fraud, the Chief Executive Officer and Board Executive Chair should be contacted and informed of the known facts and details of the situation. The representative must exercise sound judgment to avoid baseless allegations. If a GWC Representative has knowledge of or a concern of illegal or dishonest fraudulent activity, there are multiple avenues to report:

1. our confidential email – [integrity@globalwatercenter.org](mailto:integrity@globalwatercenter.org)
2. directly to the CEO, Human Resources, a member of the Board, or Senior Leadership Team
3. Mail: (mark "Confidential")

Global Water Center

Attention: Integrity

1150 Molly Greene Way, Bldg 1605

North Charleston, SC 29405

## Investigation

Once a complaint alleging a breach of the Code of Conduct has been filed, a person or persons will be appointed to investigate the complaint and report their findings and recommendations to the Governance Committee and the Board of Directors. The investigator may be internal or external. All reports are taken seriously and will be investigated.

Once an investigation is launched, the investigator will:

- Advise the alleged offender of the investigation and the specifics of the complaint.
- Advise the complainant of the investigation.
- A complete and impartial investigation will be conducted in a timely manner. All parties to the complaint and any other individuals who may be able to provide relevant information will be interviewed.
- When the investigation is complete, the results of the investigation are either:
  - o **Evidence confirms an infraction:** If the evidence does support the complaint, then corrective or disciplinary actions are taken.
  - o **Evidence does not confirm an infraction:** If the evidence does not support the complaint, no documentation is placed in the file of the alleged offender. The investigation is closed.
  - o When a complaint is made in “good faith”, no documentation will be placed in the complainant’s file, regardless of whether the complaint is upheld or not.
  - o If a claim is found to have been made in “bad faith”, where the offender was falsely accused, the complainant may be subject to corrective or disciplinary action up to and including termination with or without notice or with payment in lieu of notice.

## Confidentiality and Protection from Retaliation

Integrity protectors are provided protection in two key areas – confidentiality and against retaliation. As far as possible, the confidentiality of the integrity protector will be maintained. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law and to provide accused individuals their legal rights of defense. GWC will not retaliate against an integrity protector. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, or poor work assignments and threats of physical harm. Any integrity protector who believes they are being retaliated against must contact Human Resources or executive leadership immediately. The right of an integrity protector for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

## Acting in Good Faith

Integrity protectors should exercise sound judgment to avoid baseless allegations. A representative who intentionally files a false report will be subject to discipline up to and including termination.

GWC representatives with any questions regarding this policy should contact the executive leadership team and/or Human Resources.

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