



## **Whistleblower Policy**

### **General**

The International Peace Institute (“IPI”) has established a Whistleblower Policy (the “Policy”) that requires directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Employees and representatives of IPI must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations. IPI is committed to an office culture of strict accountability and high reputational standards.

### **Reporting Responsibility**

It is the responsibility of all directors, officers, and employees to comply with this Policy and to report violations or suspected violations in accordance with this Policy. You are responsible for reporting improper financial statement disclosures, suspicious accounting practices, fraudulent transactions, serious lapses in financial controls, or any other activity that could pose a reputational risk for IPI. Potential violations of any applicable labor law, including but not limited to sexual harassment or discrimination, and of any relevant federal or state regulations as well as the purposeful misrepresentation of IPI’s activities or financials to a governmental or oversight body should be reported as soon as practicable.

### **No Retaliation**

No director, officer, or employee who in good faith reports a violation pursuant to this Policy shall suffer harassment, retaliation, a diminution of pay, benefits, status, primary job duties, or any adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Policy is intended to encourage and enable employees and others to raise serious concerns within the organization prior to seeking resolution outside of IPI.

### **Reporting Violations**

IPI suggests that employees share their questions, concerns, suggestions, or complaints with someone who can address them properly. In most cases, you are encouraged to speak with the Human Resources Manager, President, or anyone in management whom you are comfortable in approaching. Managers are required to report suspected violations to the Treasurer of IPI’s Board of Directors, who serves as Compliance Officer for this Policy, with specific and exclusive responsibility to investigate all reported violations. For suspected fraud, individuals should contact IPI’s Compliance Officer directly. They may also notify the Compliance Officer on a confidential or anonymous basis if so desired. As a regular part of the process of annual

performance reviews staff are encouraged to consider and report whether they have observed any activity that could put IPI at reputational risk or legal or financial jeopardy.

### **Compliance Officer**

IPI's compliance officer is responsible for investigating and resolving all reported complaints and allegations and, at his or her discretion, shall advise the President and/or the Audit Committee of the Board of Directors. The Compliance Officer has direct access to the Audit Committee and is required to report to the Audit Committee at least annually on compliance activity.

### **Accounting and Auditing Matters**

The Audit Committee of the Board of Directors shall address all reported concerns or complaints regarding corporate accounting practices, internal controls, or auditing. The Compliance Officer shall immediately notify the Audit Committee of any such complaint and work with the Committee until the matter is resolved.

### **Acting in Good Faith**

Anyone filing a complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

### **Confidentiality**

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent reasonably possible, consistent with the need to conduct an adequate investigation.

### **Handling of Reported Violations**

The Compliance Officer will notify the sender and acknowledge receipt of the reported violation or suspected violation if the sender is identified. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

### **Compliance Officer**

Cliff Perlman, Treasurer, Board of Directors, International Peace Institute  
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