



# **GAVI ALLIANCE WHISTLEBLOWER POLICY**

Approved on 2-3 June 2009

## **1. Purpose**

GAVI Alliance Board members and staff must observe high standards of professional and personal ethics and are encouraged to make disclosures to help protect the organisation and donor assets entrusted to GAVI's care. For these reasons, GAVI must maintain an environment where it can receive, retain, and address concerns and complaints.

GAVI Alliance Board members and staff should be supported to raise concerns on issues including but not limited to the following:

- internal accounting controls, auditing fraud or mismanagement;
- financial mismanagement of donor assets;
- potential violations of law particularly in regards to fraud against the public, donors, or a government.

The purpose of this Whistleblower Policy is to provide a mechanism by which these concerns may be raised free of discrimination, retaliation, or harassment.

## **2. Definitions**

Terms found in this policy shall have the same meaning as they do within the GAVI Alliance Statutes and By-laws. Further, the following definitions shall apply:

- **"GAVI Person"** – GAVI Alliance Board Members and members of the Secretariat.
- **"Potential Violation"** – Concerns raised by a GAVI Person in the context of the policy.
- **"Compliance Officer"** – the GAVI Person responsible for investigating and coordinating resolution of Potential Violations.

## **3. Reporting a Potential Violation**

If an employee is not comfortable informing his/her supervisor or is not satisfied with the supervisor's response, (s)he should contact either the Compliance Officer or the Chair of the Audit and Finance Committee. Anyone reporting a Potential Violation must be acting in good faith and have reasonable grounds for believing the information disclosed constitutes a Potential Violation.

## **4. Confidentiality**

Reports about Potential Violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of Potential Violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. If permanent confidentiality is desired, the person reporting the Potential Violation should send an anonymous letter via postal mail.

## **5. Receiving and addressing reports**

The Compliance Officer will acknowledge in writing receipt of the report (unless complainant is anonymous) and will undertake to investigate the Potential Violation promptly. The Compliance Officer will report in writing the Potential Violations and outcomes of investigations to the Chair of the Audit and Finance Committee in due course. Should the gravity of a Potential Violation merit, the Chair of the Audit and Finance Committee will advise the Board of the outcome after investigation at the next regularly scheduled board meeting.

## **6. No Retaliation**

No GAVI Person who, in good faith, reports a Potential Violation will suffer harassment, retaliation, or adverse employment consequence. Any GAVI Person who retaliates against someone who has reported a Potential Violation in good faith is subject to discipline up to and including termination of the applicable position.

## **7. Distribution of the Policy**

A copy of this policy shall be included in each Secretariat member's Employee Handbook and an HR representative shall ensure that each Secretariat member is familiar with this policy and has contact information, including postal address, for the Compliance Officer and the Chair of the Audit and Finance Committee.

### **Compliance Officer**

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