



Whistleblowing Policy

Adopted: December 10, 2022

ICAN Values

ICAN's key concepts of peace, rights, equality and pluralism guide our work for an alternative vision of inclusive peace and security in our world. Through our programs and partnerships with members of the Women's Alliance for Security Leadership (WASL), we provide personal, professional, and institutional support and subscribe to the following core values:

- Nonviolence and active support of positive inclusive peace;
- Pluralism, social cohesion, equality, and non-discrimination;
- Social, political, and economic justice;
- Adherence to the Universal Declaration of Human Rights;
- Transforming gendered power relations to realize equality and rights;
- Amplifying community voices and building a progressive majority;
- Building on the history and legacy of women's activism and leadership;
- Mutual empowerment, support, and respect for others' experiences and avoiding duplication of work.

What is Whistleblowing?

Whistleblowing refers to the process of reporting concerns about ICAN's ethics and conduct. ICAN encourages complaints, reports, or inquiries about illegal practices or serious violations of its policies and regulations so that ICAN can address and correct them. It is the responsibility of all board members, staff, volunteers and partners to report concerns about violations of ICAN's conduct or suspected violations of law or regulations that govern ICAN's operations. Appropriate subjects to raise under this policy would include financial improprieties, accounting or audit matters, ethical violations, or other similar illegal or improper practices or policies.

No Retaliation and Confidentiality

ICAN aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. ICAN is committed to ensuring that no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that harmful practices or unethical conduct are, or may be, taking place in any part of our work. ICAN will not tolerate retaliation against anyone who, in good faith, reports a concern or participates in an investigation, even if the allegation ultimately is not substantiated.

ICAN will strive to ensure that these concerns are addressed with the utmost confidentiality and to create an environment where people feel they can safely file complaints, without fearing for their safety, their job, or their confidentiality.

Reporting Process

ICAN will accept reported concerns via email, phone, mail, or in person. ICAN encourages employees to report concerns to their direct supervisor. Supervisors are required to report complaints or concerns about suspected ethical and legal violations directly to the CEO. If an

employee has a concern about their direct supervisors, they may report directly to the CEO. Any concerns about the CEO should be reported to the Board of Directors.

ICAN also accepts complaints from external sources such as members of the public, partners and official bodies. External parties may report to any ICAN staff member including the CEO. Any ICAN staff member who receives a whistleblowing report must report it to the CEO, unless a reported incident concerns the CEO in which case it must be reported to the Board of Directors.

All concerns pertaining to potential safeguarding policy violations may be reported to ICAN's safeguarding focal point, Stacey.schamber@icanpeacework.org and financial policies violations concerns to ICAN's finance director, olga.andrew@icanpeacework.org.

Any whistleblower may choose to remain anonymous, and they may submit their reports to whistleblowingconcerns@icanpeacework.org or through ICAN's website. This email address will be accessed and monitored by Stacey Schamber, ICAN Senior Program Officer, and Olga Andrew, ICAN Finance Director.

Reports should include the following information:

- Contact information of person filing report (optional)
- Date of the report and date/time of the circumstances reported
- Location of incident
- Description of behavior observed
- Identity of persons involved and any witnesses
- Any other relevant information

Investigation and Follow up Process

ICAN CEO and Board of Directors have the responsibility to ensure that all complaints about unethical or illegal conduct are promptly investigated and resolved, with corrective action taken if warranted by the investigation.

ICAN will investigate and respond to the reported concerns according to the applicable internal policies and procedures, as well as legal and statutory obligations.

ICAN has the following policies, which may be used to address any reported concerns:

- **Anti-corruption policy** which prohibits all improper payments such as facilitation payments, kickbacks, bribes, or illegal gratuities to or from third parties, government officials, donors and customers anywhere in the world;
- **Conflict of Interest policy** which addresses any potential conflict between ICAN organizational interests and personal interests of ICAN employees or board members;
- **Safeguarding policy** which protects people, partners and beneficiaries of assistance, from any harm that may be caused due to their coming into contact with ICAN;

- **Employee manual** which includes sections on nondiscrimination, safety, standard of conduct, substance abuse, integrity and respect for human dignity, rights, and diversity, and procedures for handling complaints;
- **Financial policies** including accounting, procurement, and travel policies; and
- **Sanctions Compliance policy** which ensures ICAN's compliance with US economic sanctions.

The CEO may choose to discuss concerns at ICAN leadership team meetings and delegate the responsibility to conduct an initial investigation and to act as focal point for a particular complaint to the most appropriate ICAN leadership team member.

ICAN will give the complainant a written confirmation in the form of a letter in a reasonable timeframe which describes:

- When and how the organization received the complaint
- How the organization has responded so far
- What it will do next
- Whom the complainant should contact with questions or concerns

Further actions will be determined by the CEO and/or the Board of Directors based on the results of the initial investigation and nature of an alleged violation.

Policy Violations

Each ICAN staff member is responsible and accountable for adhering to this Policy. ICAN will apply appropriate disciplinary measures including termination to staff found in breach of this Policy. ICAN may terminate our relationship with other individuals and/or organizations working on our behalf if they breach this Policy.

Policy Communication

This Policy must be widely communicated to ICAN staff as well as to external parties. All ICAN staff must read and understand this Policy. ICAN must communicate this Policy to all external parties through all available means, such as through contractual requirements, ICAN website, etc.