

Whistleblower/Complaint Resolution Policy Animals Asia Foundation, Limited

In keeping with the policy of maintaining the highest standards of conduct and ethics, Animals Asia Foundation, Limited ("Animals Asia") will investigate complaints of suspected fraudulent or dishonest use or misuse of its resources or property by staff, board members, consultants, volunteers, or supporters. To maintain the highest standards of service, Animals Asia will also investigate complaints concerning its programs and services.

Staff, board members, consultants, volunteers, supporters, and community members are encouraged to report suspected fraudulent or dishonest conduct or problems with the services or programs provided pursuant to the procedures set forth below. This policy supplements, and does not replace, any procedures required by law, regulation, or funding source requirements.

Reporting. Animals Asia has an open door policy and suggests that employees share their questions, concerns, suggestions or complaints with their supervisor. If an employee is not comfortable speaking with his or her supervisor or is not satisfied with his or her supervisor's response, he or she is encouraged to speak with the Executive Director or a member of the Board of Directors. Board members, consultants, volunteers, supporters, and community members may also communicate their concerns with the Executive Director or a member of the Board of Directors. Supervisors, the Executive Director and Board members are required to report complaints or concerns about suspected ethical and legal violations in writing to the Animals Asia Compliance Officer, who has the responsibility to investigate all reported complaints. Alternately, to facilitate reporting of suspected violations where the reporter wishes to remain anonymous, a written statement may be submitted to one of the individuals listed above.

Investigation. The Compliance Officer is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Compliance Officer shall be the Executive Director unless the complaint involves that person, in which case it shall be the Chair of the Board of Directors. All relevant matters, including suspected but unproved matters, will be promptly reviewed and analyzed, with documentation of the receipt, retention, investigation, and treatment of the complaint. Appropriate corrective action will be taken, if necessary, and findings may be communicated to the reporting person and his or her supervisor, if appropriate. Investigations may be conducted by independent persons such as auditors and/or attorneys. Reports will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

No Retaliation. No director, officer, employee, volunteer, or supporter who in good faith reports suspected fraudulent or dishonest use or misuse of its resources or property or complaints concerning the services it provides or programs Animals Asia runs shall suffer harassment, retaliation, or adverse employment or other 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 Whistleblower/Complaint Resolution Policy is intended to encourage and enable employees and others to raise serious concerns within the organization prior to seeking resolution outside the organization. The Policy is in addition to any non-retaliation requirements contained in the Animals Asia Handbook or required by law.

This protection from retaliation is not intended to prohibit supervisors from taking action, including disciplinary action, in the usual scope of their duties and based on valid performance-related factors. Individuals making complaints must be cautious to avoid baseless allegations; employees who intentionally make false allegations are subject to disciplinary action in accordance with the Animals Asia Handbook.

As approved by Animals Asia Foundation, Limited Board of Directors on January 14, 2016.

