



## **WHISTLEBLOWER POLICY**

**OF**

## **50/50 MICROFINANCE ENTERPRISES**

### I. General

50/50's Code of Ethics and Conduct ("Code") requires directors, officers, employees, and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As representatives of 50/50, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

### II. Reporting Responsibility

It is the responsibility of all directors, officers, employees, and volunteers to comply with the Code and to report violations or suspected violations in accordance with the Whistleblower Policy.

### III. No Retaliation

No director, officer, employee, or volunteer who in good faith reports a violation of the Code shall suffer harassment, retaliation or 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 Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within 50/50 prior to seeking resolution outside the organization.

### IV. Reporting Violations

50/50 directors, officers, employees, and volunteers should share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, a supervisor is in the best position to address an area of concern. However, if you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with any member of the Board of Directors or anyone in management whom you are comfortable in approaching.

## V. Acting in Good Faith

Any good faith report, concern or complaint is fully protected by this policy, even if the report, question or concern is, after investigation, not substantiated. Anyone filing a complaint concerning a violation or suspected violation of the Code must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Code. 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.

## VI. Confidentiality

Upon the request of the complainant, 50/50 will use its best efforts to protect the confidentiality of the complainant for any good faith report. 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 possible, consistent with the need to conduct an adequate investigation.

## VII. Handling of Reported Violations

All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation. The complainant will be informed that follow-up has occurred or is occurring within two weeks after the complaint or report has been received. The Board of Directors shall be informed of all such complaints or reports.