



# GDG USA WHISTLEBLOWER POLICY

## *Summary Statement*

Establishing and maintaining a procedure for encouraging and handling reporting of wrongdoing, and protecting Whistleblowers as an aid to risk management.

## **Document Control**

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C:\GDG Taxes\Legal\GDG USA WhistleBlower Policy

## **Revision History**

Date	Revision Number	Change(s)	Section(s)
	1		
	2		

## **Related Documents**

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## 1. Purpose

To encourage reporting of wrongdoing that may cause harm by providing a convenient and safe reporting mechanism, and protection for people who make serious wrongdoing disclosures.

Whistleblowing is a constructive process which exposes serious or unusual problems that otherwise may be hidden and which can't be resolved through normal procedures. Having a robust and effective Whistleblowing mechanism is an important part of reducing the incidence and severity of risk factors.

An effective whistleblowing policy provides protection for whistleblowers; acknowledging their important service to help reduce loss and damage (financial and/or reputational) to Global Development Group USA.

## 2. Definition

A **Whistleblower** is a person (being a director, manager, employee, partner, contractor of, or volunteer for, Global Development Group USA) who, whether anonymously or not, makes, attempts to make, or wishes to report **wrongdoing**. The whistleblower is entitled to protection against reprisal for having made the report - in accordance with this Policy.

**Whistleblowing** is the disclosure or reporting of an actual or suspected **wrongdoing**.

**Wrongdoing** includes matters of legitimate concern &/or actions of 'misconduct' or otherwise 'reportable conduct', which may adversely impact individuals or entail real or potential financial, reputational or other loss to Global Development Group USA. The potential impact of wrongdoing is related to its nature, its severity - scaling from the trivial to serious, and its timing – rare or frequent.

**Misconduct** includes breaches of common law, legislation, regulations or local government by-laws; organizational policy, or generally recognized principles of ethics, or is otherwise illegal; and extends but is not limited to:

- Corrupt conduct &/or abuse of trust or position, including perverting the course of justice
- Fraud, theft or otherwise dishonest behaviour
- Official misconduct – including mismanagement/breach of procedures, unconstitutional actions, and maladministration (e.g. unjust, unreasonable, oppressive or negligent administration).
- Sexual Exploitation Abuse and Harassment
- Unlawful discrimination
- Bullying
- Serious or substantial waste of resources
- Any other serious improper conduct that could reasonably lead to disciplinary action
- The concealment of any of the above

### 3. Policy

- Global Development Group USA is committed to maintaining the highest legal, ethical and moral standards of behaviour.
- Global Development Group USA is committed to maintaining an environment where legitimate concerns are able to be reported without fear of retaliatory action or retribution.
- Where issues arise despite this established framework; those working for, or with Global Development Group USA will often be the first to discover that something may be seriously wrong or suspect.
- Directors, managers, employees, partners, contractors of, or volunteers for Global Development Group USA who are aware of possible wrongdoing have a responsibility to disclose that information
- In the first instance, Global Development Group USA Board of Directors encourage the party to have the initiative to deal with issue where appropriate by speaking to acting President of GDG USA Board of Directors with confidence about any issues – operational or otherwise – without fear of reprisal or retaliation.
- Accordingly, whistleblowing represents the ‘last resort’ –where other steps toward resolution have somehow not been effective in stopping wrongdoing.
- Having an effective Whistleblowing Policy helps manage the risk of a serious failure of the usual processes occurring, by providing a means for such situations being reported and actioned upon – and at the same time protecting the whistleblower.
- A written whistleblower report is not required, although a written complaint does streamline the investigation process.
- Accordingly, protection is available to Whistleblower’s who disclose wrongdoing that is:
  - Serious in nature
  - Reported by the Whistleblower in good faith, and
  - Made by the Whistleblower with reasonable grounds to believe the issue is true.
- Conversely, disclosures which are trivial, vexatious in nature, &/or have no substance will be dismissed as non-conforming disclosures and may themselves be treated as a false report and itself constitute wrongdoing.
- Deliberate false reports will not be tolerated and anyone found making a deliberate false claim or report will be subjected to disciplinary action, which could include dismissal.
- When a Whistleblower makes a conforming disclosure under this Policy:
  - The disclosure will be treated seriously and investigated promptly and impartially.
  - The identity of the Whistleblower must remain confidential if requested
  - They will be protected from reprisal, discrimination, harassment, victimization or employment re-assignment/termination for making the disclosure
  - If the whistleblower is implicated in the wrongful act, making a report will not necessarily shield the whistleblower from the consequences flowing from that person’s involvement in the wrongful act
  - An independent internal inquiry or investigation will be conducted
  - Issues identified from the inquiry/investigation will be resolved and/or rectified
  - The whistleblower will be informed about the outcome
  - Any retaliation for having made the disclosure will be treated as serious wrongdoing under this Policy
- Anonymous reports of wrongdoing are accepted under this policy. Anonymous reports can have significant limitations that may inhibit a proper and appropriate inquiry or investigation. These limitations include the inability to provide feedback on the outcome and/or to gather additional information to assist the inquiry/investigation. Protection mechanisms may not be able to be

provided. Global Development Group USA may be required or authorized by law to disclose the whistleblower's identity.

#### 4. Procedure

Choose the course of action with which you feel most comfortable. Remember: whistleblowing is ultimately the mature response of a loyal and committed team member: silence may give the impression that the behaviour or conduct it is acceptable.

##### a) Reporting a Disclosure

Normal channels of reporting are favoured. A whistleblower may raise their concerns verbally or in writing and should include full details together with any supporting evidence that may be available. In the first instance:

- 1) Contact acting President of GDG USA Board of Directors, Brenda Pearson at [brenda@globaldevelopmentusa.org](mailto:brenda@globaldevelopmentusa.org).
  - a) If the whistleblower is not confident in reporting to the executive management, then an alternative is to contact the GDG Australia CEO, David Pearson at [david@globaldevelopment.org.au](mailto:david@globaldevelopment.org.au).
  - b) Another alternative is to contact The Foundation Group  
615-361-9445  
2451 Atrium Way Suite 300, Nashville, TN 37214

#### 5. How a disclosure will be handled

- a) The GDG USA Board of Directors will conduct an investigation into the allegation.
- b) The investigating team will prepare an investigation report that will be reviewed by the acting President.
- c) Appropriate action will be decided by the Board of Directors

#### 6. Culture

GDG USA has a culture of good communication between all members. Our normal communications cover many areas of whistleblowing.

Global Development Group USA is committed to providing an environment which is safe for all employees. A Whistleblower will not be disadvantaged in their employment conditions or opportunities as a result of lodging a complaint.