



ACTS WHISTLE BLOWER POLICY

ACTS expects its Governing Council members, officers, employees, and other representatives to observe high standards in business and personal ethics in the conduct of their duties and responsibilities. Employees and representatives of ACTS exercise must honesty and integrity at all times in fulfilling their responsibilities, which includes complying with all applicable laws and regulations as well as international best practices. It is the responsibility of all council members, officers, and employees to report Wrongful Conduct in accordance with this Whistleblower Policy.

Definition

“Wrongful Conduct” is defined in this Whistleblower Policy to include: a serious violation of ACTS policy; a violation of applicable national, state or local law; or the use of ACTS's property, resources, or authority for personal gain or other non-organization-related purpose except as provided under ACTS Charter and policy.

This definition of Wrongful Conduct is not intended to be an exclusive listing of the illegal or improper activity encompassed by the Whistleblower Policy. The Whistleblower Policy is intended to serve as a means of reporting all serious improprieties that potentially impact the integrity and effective operation of ACTS.

Reporting Wrongful Conduct

ACTS encourages its council members, officers, and employees to share their questions, concerns, suggestions, or complaints with someone who can address them properly. Any council member, officer, or employee may report Wrongful Conduct to the Executive Director or the ACTS Ombudsman. Once a report on Wrongful Conduct is made, the Executive Director and the Ombudsman shall meet and institute an investigation into the alleged case of Wrongful Conduct.

No Retaliation

No ACTS Council member, officer, or employee who in good faith reports Wrongful Conduct will suffer harassment, retaliation or adverse employment consequence. Any council member, officer, or employee who retaliates against anyone who has reported Wrongful Conduct in good faith is subject to disciplinary action up to and including termination of employment or removal from the Governing Council, as applicable. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within ACTS prior to seeking resolution outside ACTS.

Acting in Good Faith

Anyone filing a complaint of Wrongful Conduct must be acting in good faith and have reasonable grounds for believing the information disclosed indicates Wrongful Conduct. 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.

Confidentiality

Reports of Wrongful Conduct or suspected Wrongful Conduct may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of Wrongful Conduct or suspected Wrongful Conduct will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Wrongful Conduct Cases

The Executive Director or the Ombudsman will notify the sender and acknowledge receipt of the reported Wrongful Conduct or suspected Wrongful Conduct within five business days, unless such report was submitted anonymously. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation

Signed: _____



Dr. Cosmas Ochieng
Executive Director

This day of: _____

25/02/2015