

# **MCLD-US Whistleblower Protection Policy**

*Adopted by the Board, March 2026*

This Whistleblower Protection Policy is intended to encourage individuals associated with MCLD-US including staff, whether full-time, part-time, or temporary employees, as well as volunteers, officers and directors, to report suspected or actual occurrence(s) of illegal, unethical or inappropriate events (behaviors or practices) without retribution.

1. The whistleblower should promptly report the suspected or actual event to his/her supervisor.
2. If the whistleblower would be uncomfortable or otherwise reluctant to report to his/her supervisor, then the whistleblower could report the event to the next highest or another level of management, including to any member of the Board committee.
3. The whistleblower can report the event and MCLD-US will treat this report with discretion. Reports will be kept confidential to the extent possible, with the understanding that confidentiality may not be maintained where identification is required by law or in order to enable MCLD-US or law enforcement to conduct an adequate investigation.
4. The whistleblower shall receive no retaliation or retribution for a report that was provided in good faith – that was not done primarily with malice to damage another or the organization.
5. Anyone who retaliates against the whistleblower (who reported an event in good faith) will be subject to discipline, including termination of employee, volunteer and/or Board status.
6. Crimes against person or property, such as assault, rape, burglary, etc., should be reported to local law enforcement personnel consistent with the MCLD-US Safeguarding Anti-trafficking Child-protection policy.
7. Supervisors, managers and/or Board members who receive the reports must promptly act to investigate and/or resolve the issue.

All whistleblower reports must be made in good faith and must be made in facts known by the person making the report, not on rumors or opinions. A Whistleblower who makes a report that is not done in good faith is subject to discipline, including termination of the employee, volunteer and/or Board relationship, or other legal means to protect the reputation of the organization and members of its Board and staff.