

CRS Whistleblower and Non-Retaliation Policy

Applies to:	All Staff, Affiliates, Contractors, Project Partners, Suppliers, Service Providers, Subcontractors, and Board members
Sponsor:	EVP, Global People Resources
Created On:	July 1, 2023
Approved Revision:	N/A
Expiration Date:	June 30, 2026

Purpose:

Catholic Relief Services (CRS) has a strong commitment to the highest standards of personal integrity, moral conduct, ethics, and accountability to those CRS serves and to each other. CRS' mission of protecting staff and the communities CRS serves is undermined when violations of those standards remain hidden and unreported. CRS takes violations of Policies and Laws seriously and has zero tolerance for inaction in the face of wrongful, improper, or unlawful conduct or retaliation against a Reporter of such conduct.

The intent of this Global Whistleblowing and Non-Retaliation Policy ("Policy") is to encourage and enable a Reporter to show courage, speak up, and **report reasonably suspected wrongful, improper conduct**, including **Safeguarding** violations, **Fraud and Financial** misconduct, **Employee Relations** complaints and **Retaliation** actions affecting CRS staff or colleagues. Upon receipt of a credible report, no matter the form of communication, CRS will assess, investigate and address misconduct of CRS staff and affiliates who engage in wrongdoing. CRS will report non-CRS program partner/contractor employee misconduct to partners/contractors for their own internal investigation and action.

Scope:

CRS carries out commitments around the world and is committed to respecting the dignity and common good of the people CRS serves and obeying the laws of the locations where CRS operates. It is the responsibility of CRS Staff, Affiliates, Contractors, Project Partners, Suppliers, Service Providers, Subcontractors, and Board members to report witnessed or reasonably suspected misconduct.

This Policy identifies the formal reporting channels available for reporting misconduct and how CRS manages protections for those Whistleblowers who report, or are involved in an assessment or investigation, against retaliation. Many countries have Whistleblowing laws in place; the requirements of all those laws cannot be captured in a single policy. CRS will comply with the jurisdictions(s) whose laws apply to a reported case, given the individual facts and circumstances of a case. Compliance with those laws may require CRS to deviate from this Policy or alter its approach in the assessment or investigation of a concern.

Reporters and Subjects of a Complaint may include, but are not limited to, CRS full and part-time Staff, Board members, Affiliates, Contractors, Project Partner employees, Suppliers, Service Providers and Subcontractors as defined in the [CRS Code of Conduct and Ethics](#).

"Misconduct" refers to activities or incidents which violate a CRS policy and conduct that is wrongful, improper, unlawful, or retaliatory.

"Subject of a Complaint" refers to someone who is alleged or reasonably suspected of misconduct.

"Whistleblower" and "Reporter" are used interchangeably and refer to someone who discloses misconduct.

Policy:

It is CRS' policy and practice to maintain the highest ethical standards, and to create a workplace free of inappropriate or unlawful behavior, in which people are encouraged to share concerns related to suspected misconduct without fear of retaliation. Consistent with CRS' Guiding Principles, no one covered by this Policy who reasonably suspects and reports a violation of CRS' Code of Conduct and Ethics, related Ethics Policies, or violations of law or regulations shall suffer harassment, retaliation, or adverse employment consequences.

All reports of misconduct are treated with discretion and confidentiality balanced with due process considerations. Disclosures may be made to appropriate parties throughout the investigation in order to gather information and assess and resolve the concern. CRS staff should encourage others to report reasonably suspected misconduct and should not retaliate against those Reporters for doing so. Managers and Whistleblowers are not expected to have all the details about the incident or conduct. Reporters and their management teams should not conduct investigations themselves but allow the appropriate CRS team, including Fraud, Safeguarding, or Global People Resources, to promptly proceed with an assessment or investigation upon receipt of the report.

Where Should I Report Suspected Misconduct?

All reported misconduct and retaliatory conduct are taken seriously, and once reported, will be responded to, treated fairly, confidentially, and promptly. Protected disclosures include any information reported and shared under the Policy and that includes investigating and review teams and those addressing misconduct. Reporters are encouraged to notify CRS first of any misconduct.

CRS Staff should speak up when they reasonably suspect a violation and report all concerns through any of the following channels:

- Manager or Supervisor
- Human Resources (CP HR, [HRBP](#), [RPO](#), or GPR)
- Country Representative

- The CRS Whistleblower site ([EthicsPoint](#)) where staff may submit an online report with option of anonymity¹
- Email: alert@crs.org
- 1-866-295-2632 (additional country specific numbers are available on the [EthicsPoint](#) site)
- Mail:
Attention:
General Counsel
Catholic Relief Services
228 W. Lexington Street
Baltimore, MD 21201

Violations related to a US Federal Contract

Reports may report violations related to a Federal contract or grant - including the competition for, or negotiation of, a contract or grant relating to U.S. government grants or contracts to a member of U.S. congress or representative of congressional committee, a U.S. Inspector General (OIG) for the agency that awarded the contract (ex. [USAID's OIG Hotline](#), [USDA OIG Hotline](#), or [US Dept of Labor OIG Hotline](#)), the [U.S. government Accountability Office](#), a Federal employee responsible for contract/grant oversight or for investigating misconduct, or a U.S. court or grand jury).

Managers and Whistleblowers are not expected to have all the details about the incident or conduct, nor should managers or Reporters investigate the concern prior to reporting.

Protected disclosures are confidential and include any information reported and shared under the Policy and that includes investigating and review teams and those addressing misconduct. Reporters may also notify a donor when required. CRS may, where required, report the incident externally to a relevant non-US government agency, donor, or program partner/contractor with employees involved in the incident.

What will happen when I report?

After submission of a report on misconduct, the report will be assessed, considered for investigation, and Reporters will be protected in line with this Policy. Reports will be acknowledged in writing in a timely manner, recorded, and carefully reviewed by a dedicated staff within the Safeguarding, Fraud/Financial Misconduct, or Employee Relations team to determine whether an investigation is required. When required, an investigation will be initiated promptly. It is helpful

¹ While anonymous reporting is possible, it can sometimes make follow-up difficult or impossible. The Ethics Unit would work with the Reporter and/or victim/survivor to address concerns on safety, security and well-being to allow an investigation to proceed.

for Investigators to contact Reporters to obtain further details about an incident, however, Reporters may wish to remain anonymous and report incidents through [EthicsPoint](#).²

The length and scope of the investigation will depend on the subject matter of the report. CRS endeavors to provide a prompt resolution to any concern raised, however case complexity can vary based on individual facts and circumstances. Once the investigation is complete, the Whistleblower and Subject of Complaint will be notified. Due to confidentiality of the investigation, the Whistleblower may not be told of the details or outcome of the investigation.

What should be reported to CRS?

Misconduct incorporates conduct violations of [CRS' Code of Conduct and Ethics](#), [Safeguarding, Fraud and Financial Misconduct](#), Employee Relations, and Retaliation which are outlined below and in other [CRS policies](#). However, there are many local laws and regulations that may prohibit conduct not specifically found in CRS policies which should be reported. If the Reporter knows the conduct is illegal where it was performed, the Reporter must report the issue to CRS.

A Reporter must use their best judgment when determining whether to report conduct that is not specifically outlined below. In considering whether to report a concern, the Reporter should consider whether 1) the conduct makes them uneasy, 2) if their instincts tell them something is “not right” about a situation, or 3) if the conduct reasonably seems to violate the [CRS General Code of Conduct & Ethics & Ethics](#) or [Policy on General Workplace Conduct](#). In determining whether something is “not right,” the Reporter should consider CRS' [Mission and Guiding Principles](#) and whether the conduct promotes or hinders CRS' mission, CRS' reputation, and CRS' ability to protect and serve. In addition, the Reporter, when unsure about whether to report, should ask Human Resources or a trusted manager or supervisor for guidance in making the right decision.

Reports of a violation that the Reporter knows is false is a serious breach of the [Policy on General Workplace Conduct](#) as is reporting allegations that are malicious and with an intent to misinform. Such reporting is also a serious breach of the [CRS Code of Conduct & Ethics](#). These will be investigated and may result in disciplinary action up to and including termination of employment.

Safeguarding Violations

Safeguarding is fundamental to CRS' identity as a humanitarian and development organization and to CRS' commitment of accountability to those served. Safeguarding is the protection from all forms of harassment or bullying based on a status protected by law, sexual harassment, exploitation, and abuse, including sexual exploitation and abuse and human trafficking. Harassment, bullying, and sexual harassment refer to prohibited conduct or behavior by CRS Staff,

² While anonymous reporting is possible, it can sometimes make follow-up difficult or impossible. The Ethics Unit team would work with the Reporter and/or victim/survivor to address concerns raised on safety, security, and well-being to allow an investigation to proceed.

Affiliates, Project Partners, Suppliers, and Service Providers against CRS Staff, Affiliates, Project Partners, Suppliers, and Service Providers defined in the [CRS Policy on Safeguarding](#).

Retaliation against a Reporter of a Safeguarding violation in the form of harassment, bullying, or abuse is strictly prohibited and violates [CRS Policy on Safeguarding](#).

Further details about CRS' Safeguarding protections and definitions of the prohibited conduct may be found in detail in the [CRS Policy on Safeguarding](#).

Fraud & Financial Misconduct

CRS views stewardship of donor resources as a serious responsibility and does not tolerate fraud or financial misconduct.

The agency defines fraud as "An act or course of dishonesty, an intentional concealment, omission, or perversion of truth, to (1) gain unlawful or unfair advantage, (2) induce another to part with some valuable item or surrender a legal right, or (3) inflict injury in some manner."

The [Fraud Allegation Management \(FAM\) Procedure](#) ensures CRS manages fraud allegations and suspicions through a process that meets the CRS and donor regulatory requirements. CRS handles all reported incidents and allegations in a thorough, confidential, and responsible manner.

Fraud and financial misconduct include but are not limited to:

- obtaining something of value through willful or false misrepresentation;
- deception, concealment of information made with the intent to deceive and result in financial or personal gain;
- embezzlement;
- asset misappropriation;
- failure to disclose conflicts of interest;
- corrupt Practices including bribery, kickbacks, illegal gratuities and facilitation payments;
- nepotism: favoring relatives, friends, or associates;
- procurement fraud including collusive behavior between vendors and staff, bid rigging, manipulation, economic extortion;
- false claims and dishonest attempts to obtain an undue payment;
- theft as a result of fraudulent action; or
- falsification or willful misrepresentation of transactions or alteration of accounting, financial records to mislead.

[Fraud Allegation Management \(FAM\) Procedure](#)

For details on fraud violations, detection and how CRS responds and manage reported allegations refer to the [CRS Code of Conduct & Ethics](#), the Fraud Allegation Management Procedure, applicable donor regulations, and HR policies. In addition, CRS must maintain compliance with numerous legal regulations around the world. The [Anti-Money Laundering, Anti-Terrorist](#)

[Financing, Export Controls, Economic Sanctions, and Excluded Parties Policy & Procedure](#) explains some of those obligations in more detail. CRS is also subject to the [United States' Foreign Corrupt Practices Act](#) and [False Claims Act](#).

Employee Relations Matters

Employee Relations involves creating and maintaining a healthy employer-employee relationship through recognizing and proactively preventing workplace problems, unfair treatment, or performance concerns. It also includes compliance with employment/labor law and agency policies.

Behavior that deviates from expected CRS' staff values outlined in the [Policy on General Workplace Conduct](#), violates employment law, falls within the employee relations issue types below, or does not promote a culture of respect, equity, diversity, and inclusivity should be reported. Speaking to a manager or supervisor, country program HR, HRBP, RPO, or to someone in GPR is ideal, however, anyone may share a concern through [EthicsPoint](#).

Employee Relations issue types include:

Actions Against the Agency – abusing /damaging CRS property or property of staff; possessing, distributing, selling, or using alcohol or illegal drugs in the workplace; disclosing confidential information; using work time to conduct personal business; failing, or refusing to follow reasonable directions from supervisor; not following proper agency protocols.

Offensive / Inappropriate Communication– using offensive, obscene language; spreading rumors, making malicious, false, and harmful statements; overly critical; blaming, scolding, or shaming; making derogatory or humiliating remarks.

Offensive / Inappropriate Behavior – creating conflict or discord in the workplace; displaying behavior and/or taking action that disrespects others; showing partiality that benefits some and excludes others/favoritism; demonstrating combative or belligerent behavior; using social media inappropriately; committing criminal acts **not** involving CRS resources or violating the Safeguarding Policy.

Violence in the Workplace – threatening physical harm or assaulting a person.

Inappropriate Use of Authority – making unreasonable demands on staff; refusing to take action to support staff; using improper management practices.

Employment Opportunity Discrimination – restricting persons or members of a group -- based on ethnicity, color, religion, sex, age, sexual orientation, national origin, disability, medical condition, marital status, or veteran status -- from opportunities or positions that are available to members of other groups. *Example:* excluding qualified candidates from the hiring process.

Employee Benefits Discrimination – unlawfully restricting persons or members of a group–based on ethnicity, color, religion, sex, age, sexual orientation, national origin, disability, medical

condition, marital status, or veteran status—from benefits or services that are available to members of other groups. *Examples:* denying compensation adjustments, benefits, or use of agency services.

Intentional False Reporting – submitting an employee relations concern in bad faith.

Interference with Employee Organizational Activities – taking any action that has a chilling effect on two or more employees’ attempts to organize for representation purposes and the attempts are protected by applicable law.

Retaliation – taking adverse employment action against any person reporting an employee relations concern or against a person reporting compliance issues with legally mandated pay or benefit statutes, examples include minimum wage, overtime pay, employee safety, insurance coverage, or other protected worker right or benefits within a legal jurisdiction.

Unfair Recruitment Process – deviating from [CRS’ recruitment policies and procedures](#).

Unfair /Unlawful Termination – unfair/ unlawful end of employment contract.

Non-Retaliation

This Policy makes retaliation actions against a Reporter, Whistleblower, or participant in an investigation subject to disciplinary action, up to and including termination of employment or termination of a Partnership. Reporters will not suffer adverse consequences or retaliation for refusing to do something that violates CRS’ Code of Conduct and Ethics, Global and Country Program Policies or laws, for raising a concern about reasonably suspected potential misconduct, or for cooperating during investigations. Any threats or attempts to retaliate against Reporters are prohibited and must be reported immediately through the reporting channels highlighted in this Policy or [EthicsPoint](#) so that interim protective measures may be implemented.

Retaliation against anyone who participated in an investigation is gross misconduct and will lead to disciplinary action of the individual(s) who initiated or participated in the retaliation and may include termination of employment for cause. Retaliation is detrimental conduct in the form of a negative action taken against any person who makes a disclosure of information that is reasonably suspected to be true when made, or detrimental conduct against anyone who assists or participates in an investigation of that disclosure. Retaliation may also be any action that has a chilling effect on a party’s desire or attempt to report. Retaliation is made with the intent to punish, intimidate, or injure due to participation in the Whistleblowing investigation. Retaliation actions by non-CRS employees against CRS staff will, as appropriate, be reported to the non-CRS employees’ employer or local authorities for action.

Examples of retaliation include but are not limited to unjustified discharge, unjustified demotion, discriminatory treatment, unsubstantiated performance improvement plans, unjustified loss of promotion opportunity, unjustified change of job responsibilities, harassment, or threats or intimidating acts towards to the Reporter or others who participate in the investigation, their family, or their property.

If a Reporter or investigation participant believes and communicates to the investigation team or a CRS Staff that they may be retaliated against, or if the investigation team determines through the investigation that retaliation is possible, CRS may put interim protection measures in place where and when needed. The investigation team, in partnership with the country program and other relevant parties, will determine the appropriate measures to take, with the consent of the threatened party, to ensure protection from retaliation after the report is made. These measures may include [administrative leave](#) for a party, temporary reassignment of a party, transfer of a party to another function or office, providing additional protection for a party, or any other appropriate security measure CRS, at its sole discretion, deems needed given the facts and circumstances of the case.

Conduct Not Covered by This Policy

Certain conduct may not be considered reportable nor be considered Retaliation and is not covered by this Policy. Such actions include personal workplace grievances, which are reports of behavior that have implications for the individual personally, but not CRS. Examples include personal disapproval of or disagreement with the actions of another that does not violate a CRS policy or value; differences in ethical principles; interpersonal conflict between two employees not amounting to bullying or harassment; issues that do not reflect discriminatory behavior but include dissatisfaction with a manager or supervisor; pay and benefits that comply with the law; decisions relating to employment or engagement, such as a transfer, promotion or lack of promotion due to performance issues; or disciplinary action not linked to any form of reprisal or discrimination. Personal work-related grievances should be raised by Staff with their manager or their supervisor, and, if unresolved, escalated in writing through their Country Program HR, [HRBP](#), [RPO](#), GPR, manager, or supervisor. Supervisors are responsible for ensuring complaints are explored and resolved. Where a country program has a complaints resolution process, managers and supervisors should follow that process through closure, otherwise, the manager should contact their Human Resources Manager to discuss resolution.

Adherence and Responsibility

The standards in this Policy are important to CRS. Zero tolerance implies that all allegations are assessed, investigated as needed, and appropriate action is taken. Full compliance is expected of all CRS Staff, Affiliates, Contractors, Project Partners employees, Suppliers, Service Providers, Subcontractors, and Board Members. Violation of these standards, or knowingly facilitating or aiding a Subject of a Complaint in misconduct is a serious matter and may result in disciplinary action, up to and including termination of an employment relationship or a Partnership.

Depending on the misconduct, context, and local laws, CRS may report allegations and CRS investigative findings to donors and local law enforcement authorities.

Interpretation and Questions:

Questions on the interpretation of this Policy, and any other questions about its contents, can be directed to the Safeguarding Director, Field Operations Director Ethics, Director of Global Employment Compliance, or [EthicsPoint](#).

This contents of this Policy are subject to the Content and Disclaimer included in the [CRS Policy on Policy Development, Review & Approval](#).

Resources

[CRS Code of Conduct and Ethics](#)

[Anti-Money Laundering, Anti-Terrorist Financing, Export Controls, Economic Sanctions, and Excluded Parties Policy & Procedure](#)

[Anti-Trafficking in Persons Compliance](#)

[CRS Policy on Administrative Leave](#)

[CRS Policy on Conflict of Interest](#)

[CRS Policy on General Workplace Conduct](#)

[CRS Policy on Safeguarding](#)

[Fraud Allegation Management \(FAM\) Procedure](#)

[Partner Safeguarding Policy & Procedure](#)