



## **Whistleblower Protection Policy**

### **Introduction**

Kiva Microfunds (“Kiva”) is committed to high standards of ethical, moral, and legal business conduct. Kiva is further dedicated to acting in good faith with those employees who raise concerns regarding incorrect financial reporting, unlawful activity, or otherwise improper conduct.

This Whistleblower Protection Policy aims to provide employees with an avenue for raising such concerns, and to reassure such employees that they will be protected from reprisal or retaliation as a consequence of reporting the alleged wrongdoing of any officer, director, employee or other representative of Kiva.

Kiva reserves the right to modify or amend this policy at any time.

### **Policy: No Retaliation**

No board member, officer, employee or other representative who in good faith reports a violation of a law or regulation requirement 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.

### **Reporting Process**

This Whistleblower Policy is intended to encourage and enable persons to raise serious concerns in good faith. Such concerns, including those relating to financial reporting or unethical or illegal conduct, may be reported directly to the Chief Financial Officer or General Counsel. If the individual feels uncomfortable reporting directly to the CFO or General Counsel, they may anonymously submit a report using this [Google Form to report to the CFO](#) or this [Google Form to report to the General Counsel](#). In the event that an individual’s concern rises to the level that they reasonably believe that such notice will be disregarded or otherwise not fairly considered, the individual may then report violations or suspected violations to the Audit Committee of the Board of Directors by emailing [auditcommittee@kiva.org](mailto:auditcommittee@kiva.org). If the individual still feels uncomfortable using any of these resources to report concerns, they may anonymously submit a report to the [Audit Committee via this Google Form](#).

Employment-related concerns should continue to be reported through managers as described in the Employee Policy Library.

Anyone filing a complaint concerning a violation or suspected violation of the law, regulation or policy must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. 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.



The General Counsel, working with the Audit Committee, will act as Kiva's Compliance Officer. The Compliance Officer is responsible for investigating and resolving all employee complaints and allegations concerning suspected violation of law, regulation or policy. The Chief Financial Officer, Audit Committee, or their designee will take on the Compliance Officer role if the complaint involves the General Counsel. If the complaint involves both the General Counsel and/or Chief Financial Officer and the Audit Committee, the head of Kiva's People Team or outside legal counsel will carry out the functions of the Compliance Officer. Please note that if a report is made via one of the anonymous Google Forms provided above, the Compliance Officer will be unable to follow up with the individual who reported the concern.

### **Confidentiality**

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously as detailed above. Reports of violations or suspected violations and the identity of the complainant will be kept confidential to the extent possible, with the understanding that certain details may need to be shared with others in order to conduct an adequate investigation and to comply with applicable law.

### **Handling of Reported Violations.**

The Compliance Officer, or the person responsible for carrying out the Compliance Officer's role with respect to a reported or suspected violation, will acknowledge receipt of the reported violation or suspected violation in person or by email to the complainant (if the individual has identified themselves) within five business days.

All reports will be promptly investigated in coordination with in-house counsel and appropriate corrective action will be taken if warranted by the investigation.

In the event a reported violation concerns corporate accounting practices, internal controls or auditing, the Compliance Officer shall promptly notify the Audit Committee of such complaint and work with the Audit Committee and in-house or outside counsel to investigate the complaint and take appropriate corrective action if warranted by the investigation.