

Whistleblower Policy

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Table of Contents

Definitions3

1. INTRODUCTION3

2. REPORTING AND INVESTIGATION OF ALLEGATIONS OF WHISTLEBLOWERS5

3. REPORTING AND INVESTIGATION OF INSTANCES OF RETALIATION6

4. PROTECTION FOR STAFF WHISTLEBLOWERS AND WITNESSES6

5. PROTECTION FOR EXTERNAL WHISTLEBLOWERS AND WITNESSES7

6. EXTERNAL REPORTING7

7. SUPPLEMENTARY CLAUSES8

DEFINITIONS

- a) “Evidence” means any physical object, record, document (in any form), testimony, or other information that tends to establish the existence or non-existence of an allegation or fact.
- b) “false or malicious allegations” means allegations that knowingly, deliberately or recklessly mislead, or attempt to mislead, a party.
- c) “Retaliation” is misconduct and is any detrimental act, direct or indirect, recommended, threatened or taken against a Whistleblower or Witness of person associated with a Whistleblower or Witness in a manner material to the complaint because of the report or cooperation with a GGGI investigation by the Whistleblower or Witness. It includes, but is not limited to, harassment, discriminatory treatment, assignment of work outside of the corresponding job description, inappropriate performance appraisals or salary adjustments, or the withholding of an entitlement. As Retaliation constitutes misconduct, those engaged in Retaliation are subject to disciplinary measures.
- d) “Whistleblower” is any person who, in good faith and voluntarily, reports a suspected integrity violation or misconduct.
- e) “Witness” means any person who is not the subject of an investigation of integrity violation and/or misconduct but who provides information or Evidence at the request of the Deputy Director-General for Management and Administration (the “DDG-M&A”), or the Chair of the Council when applicable, regarding a matter under investigation.

1. INTRODUCTION

1.1. Purpose

- 1.1.1. The Global Green Growth Institute (“GGGI”) is committed to transparency, accountability and openness in the organisation. This policy aims to create an environment where staff members and external persons feel safe to report any misconduct or activities that work against the best interests of GGGI without the fear of Retaliation.

1.2. General Principles

- 1.2.1. It is the duty of staff members and other applicable parties to report any breach of GGGI regulations, rules, policies and procedures to the official(s) whose responsibility it is to take appropriate actions, and to cooperate fully with duly authorized audits and investigations. An individual who makes such a report in good faith and/or cooperates fully with audits and investigations has the right to be protected against Retaliation.

- 1.2.2. A staff member or any other party covered by this policy who is found to have retaliated against another shall be subject to remedial actions under the applicable GGGI regulations, rules, policies and procedures.
- 1.2.3. Any person who reports a suspected integrity violation or misconduct may remain anonymous or request that his or her identity be kept confidential. However, Whistleblowers and Witnesses are encouraged to report in a transparent manner that will facilitate effective investigation which may require open or confidential, rather than anonymous, reporting.
- 1.2.4. Whistleblowers must provide all information they have concerning the basis of the allegations and sufficient detail or supporting Evidence such that the matter can be pursued responsibly. Even where anonymous allegations are sufficiently detailed or supported to permit an investigation to be conducted, no final finding of misconduct shall be made based solely on the anonymous allegations without independent corroboration.
- 1.2.5. GGGI shall protect the identities of Whistleblowers and Witnesses and information obtained from them from unauthorized disclosure during and after an investigation, unless such a person consents to disclosure. Should it be determined however that the person knowingly made a false or malicious allegation, that such information has already been disclosed, or such information is required to pursue disciplinary procedures as per GGGI Staff Regulations and Staff Rules, GGGI shall not guarantee protection.
- 1.2.6. The GGGI shall undertake all efforts possible to avoid any conflict of interest, either real or perceived, interfering with the application and implementation of this policy. Any party with real or perceived conflict of interest shall exclude him- or herself or be removed from any proceedings conducted in pursuit of this policy.
- 1.2.7 The DDG-M&A, and where applicable the Chair of the Council, shall maintain a detailed log of the reported whistleblower cases as well as details of action taken in response to such reports.

1.3. **Application**

- 1.3.1. This policy applies to staff members, former staff members and any other third parties that directly or indirectly do business with or have interest in GGGI or its operations or activities. If any of the aforementioned parties consider that GGGI should be made aware of an integrity violation or misconduct, this policy will provide the necessary channels to resolve the concern. Integrity violations or misconducts may include, but is not limited to:
 - a) misuse of GGGI or donor country funds;
 - b) misuse of GGGI assets;

- c) irregularities or conduct which constitutes an offence or a breach of GGGI regulations, rules, policies or procedures, and laws and regulations that apply to GGGI;
 - d) misrepresentation of facts;
 - e) intentional omission of or hiding of facts, where intentional is defined as the willingness to bring about something planned or foreseen;
 - f) harassment or wrongful discrimination on the basis of age, race, colour, sex, sexual orientation, or national origin; and health and safety risks, including risks for the public as well as for other staff members, and contractors' damage to the environment.
- 1.3.2. If the Whistleblower chooses to pursue channels other than the ones outlined in this policy, then they shall not be guaranteed the protection provided for in this document.
- 1.3.3. This policy does not protect reports that are based on unsubstantiated rumours. Making a report or providing information that is intentionally false or misleading constitutes misconduct and may result in disciplinary or other appropriate action.
- 1.3.4. No person may use the provisions of this policy to avoid remedial actions in case of wrong-doing.

2. REPORTING AND INVESTIGATION OF ALLEGATIONS OF WHISTLEBLOWERS

- 2.1. A staff member has a duty to report in writing to the DDG-M&A any suspected integrity violation or misconduct of the staff members (except the staff in the Executive categories of GGGI – see 2.5 below) and of any third parties covered under this policy as soon as he or she becomes aware of the same. GGGI shall make available an appropriate communication channel for such reporting, which shall be indicated in the Guidelines for GGGI Anti-Corruption Policy and Whistleblower Policy.
- 2.2. A Whistleblower must make the report in good faith and must submit information or Evidence to support a reasonable belief that integrity violation or misconduct has occurred. When such a report is made, the DDG-M&A shall decide the course of action to be taken in accordance with the applicable GGGI regulations, rules, policies or procedures.
- 2.3. A staff member who is the subject of a preliminary inquiry or an investigation has a duty to cooperate with the person conducting the investigation. Failure or refusal to cooperate may constitute misconduct under this Policy.
- 2.4. A Whistleblower, other than one who has remained anonymous, may request from the DDG-M&A updates on the status of GGGI's review or investigation into the reported suspected integrity violation or misconduct as well as notice of the final

outcome of the review or investigation. Information regarding disciplinary measures imposed on another staff member shall be handled in accordance with the provisions of GGGI Staff Regulations and Rules and shall not be disclosed.

- 2.5. Where a report involves staff in the Executive category of GGGI, such a report shall be made to the Chair of the Council of GGGI. The GGGI shall make available an appropriate communication channel for such reporting, which shall be indicated in the Guidelines for GGGI Anti-Corruption Policy and Whistleblower Policy. The Chair may use the procedures provided in this policy or take other procedures to investigate and make decision on the course of actions to be taken in response to such reports.

3. REPORTING AND INVESTIGATION OF INSTANCES OF RETALIATION

- 3.1. Whistleblowers or Witnesses who believe that they have been subject to Retaliation as a consequence of reporting a suspected integrity violation or misconduct or of cooperating with an investigation may report to the DDG-M&A their concern and seek relief from Retaliation, except for the cases involving or regarding the staff in the Executive category of GGGI which shall be made to the Chair of the Council as provided in 2.5 above. A report of Retaliation shall be made through the same communication channel provided in 2.1 and 2.5 above. Whistleblowers or Witnesses must make the report in good faith and may be requested to submit information or provide Evidence to support their complaint. Such Evidence may include Witnesses' accounts.
- 3.2. A report of Retaliation shall not interfere with the investigation of the primary allegation of integrity violation or misconduct.
- 3.3. The DDG-M&A and, where applicable, the Chair of the Council shall review reports of Retaliation to determine the course of action to be taken.
- 3.4. Upon conclusion of an investigation concerning Retaliation, the affected Whistleblower or Witness shall be provided with a report which shall indicate its investigative findings as to whether Retaliation occurred and recommendations for remedial actions. Disciplinary measures imposed on staff members will be handled in accordance with the provisions of GGGI Staff Regulations and Rules and will not be disclosed.

4. PROTECTION FOR STAFF WHISTLEBLOWERS AND WITNESSES

- 4.1. The GGGI may take interim measures during the course of the review or investigation as necessary to safeguard security and interests of Whistleblowers and Witnesses who are staff members, including but not limited to temporary reassignment to another position or paid administrative leave. GGGI may also place the staff member against whom an allegation is made on a temporary suspension or administrative leave to protect the Whistleblower or Witness.
- 4.2. If a staff member believes that there is a direct and imminent threat to his or her personal security or to the security of his or her family, he or she can raise the

concern with the DDG-M&A, or, if the threat is from any of the staff in the Executive category of GGGI, the Chair of the Council who will provide guidance to the staff member on appropriate security measures.

- 4.3. When it is found that Retaliation has occurred, the appropriate remedial actions may include relief or other corrective measures for the staff member who has been subject to Retaliation.
- 4.4. Whistleblowers or Witnesses who are staff members and have claimed to have been subject to Retaliation may appeal any decision of GGGI on the matter under the relevant GGGI internal appeals system.

5. PROTECTION FOR EXTERNAL WHISTLEBLOWERS AND WITNESSES

- 5.1. GGGI shall endeavour to ensure that external Whistleblowers and Witnesses are protected from Retaliation by staff members.
- 5.2. When an external Whistleblower or Witness reports Retaliation to the DDG-M&A or, where applicable, the Chair of the Council, he or she shall review the report to determine the course of action to be taken.
- 5.3. Upon conclusion of an investigation concerning Retaliation against an external Whistleblower or Witness, the affected Whistleblower or Witness shall be provided with a report which shall indicate whether Retaliation occurred as a result of the Whistleblower's or Witness's report of integrity violation or misconduct and shall make recommendations to the relevant department for remedial action. The Whistleblower or Witness shall be immediately informed of the action taken. Disciplinary measures imposed on staff members will be handled in accordance with the provisions of GGGI Staff Regulations and Rules and will not be disclosed.
- 5.4. External parties who make false or malicious allegations or who retaliate against Whistleblowers and Witnesses may have their contract(s) terminated, proposal(s) for award of contract rejected or award(s) of contract cancelled or withdrawn, may be declared ineligible to participate in GGGI-financed or GGGI-supported activities, or may be subject to sanction or other remedial action.

6. EXTERNAL REPORTING

- 6.1. Protections against Retaliation shall be extended to a staff member who reports a suspected integrity violation or misconduct to an entity or individual outside of the established internal mechanisms where the criteria set out in subparagraphs 6.1.1, 6.1.2 and 6.1.3 are satisfied:
 - 6.1.1. such reporting is necessary to avoid:
 - a) a significant threat to public health and safety; or
 - b) substantive damage to GGGI's operations; or

c) violations of national or international law; and

6.1.2. the established internal mechanisms are inadequate because:

a) the staff member has reasonable grounds to believe that he or she will be subjected to Retaliation by the person(s) he or she should report to pursuant to the established internal mechanisms; or

b) It is likely that Evidence relating to the misconduct will be concealed or destroyed if the staff member reports to the person(s) he or she should report to pursuant to the established internal mechanisms; or

c) the staff member has previously reported the suspected integrity violation or misconduct through the established internal mechanisms (and not on an anonymous basis), and GGGI has failed to inform the staff member in writing of the status of the matter within six months of such report; and

6.1.3. the staff member does not accept payment or any other benefit from any party for such report.

6.2. External reports made in accordance with the above and consistent with any confidentiality obligations to concerned third parties shall not be considered as a breach of staff obligations relating to disclosure of information.

7. SUPPLEMENTARY CLAUSES

7.1. Guidelines on application and implementation of this Policy are to be issued separately.

7.2. Amendments shall be made by the authority of the Director-General of GGGI.