

Whistleblowing Policy



Approved and valid from July 2, 2019

Preamble

Whistleblowing is the most effective way to detect fraud and misconduct. Swisscontact has already a Compliance Officer in charge where employees can report suspected breaches of the Code of Conduct. Swisscontact has implemented an additional reporting line for internal and external whistleblowers such as subcontractors, suppliers and beneficiaries. They can report anonymous or namely by phone or by form on an internet platform which is hosted by a professional provider. Details and links are on Swisscontact's website available.

Whistleblowing Principles

Swisscontact's good reputation is based on the trust of donors, authorities, customers, employees and the public. Reputation is an expression of our integrity and ethical conduct.

Against this background, this policy ensures that illegal behaviour or other misconduct is reported to Swisscontact in order to protect the foundation from possible negative consequences.

Speak up Principle & samples

Swisscontact employees, donors, implementing organizations, subcontractors and other stakeholders are encouraged to report any suspected breaches of the Code of Conduct, laws, regulations, instructions from authorities or internal rules and guidelines.

Examples of misconduct (not exhaustive): *

- Fraud and theft;
- Corruption, bribery, inappropriate gifts;
- Antitrust breaches;
- Manipulation of business or accounting documents;
- Any kind of discrimination and sexual harassment;
- Child labour;
- Slavery;
- Etc.

*See also Code of Conduct.

Protection of involved persons

- **Protection of whistleblowers:** Swisscontact wants to protect whistleblowers. Discrimination or retaliation against any person who reports a suspected misconduct or provides evidence in good faith is not tolerated.
- **Protection of victims:** Victims must be protected as much as possible. Before any legal steps or other measures are taken with a possible impact on the well-being or integrity of victims they must be asked for their written approval.
- **Protection from false complaint:** A false accusation or misleading information might be subject to disciplinary action of appropriate degree. There will be no retaliation for bona fide reporting of a suspected breach of this policy.

- **Protection of confidentiality:** Confidentiality must be guaranteed by any persons involved, i.e. Compliance Responsible, HR employees, superiors, Board Members and the provider Safecall.

Speak up - what to do in case of a concerned potential misconduct?

We understand it is not always easy to raise concerns about possible misconduct, but we do encourage you to come forward with any concerns and speak up! Therefore, Swisscontact has implemented the following reporting channels. Any concern will be dealt with appropriately and confidentially.

Internal reporting channel

Express yourself clearly and confidently if you feel concerned about specific comments or actions of another employee or superior:

- **Ask for a personal conversation:** either one-to-one between the parties concerned or in the presence of a trustworthy person.
- **Contact a trustworthy superior:** This could be in our offices such as the Country Director, Regional Director, the Director People & Learning at Head Office or any other superior you can trust.
- **Consult the local Compliance Officer** (orally or through a confidential letter), who will treat the matter with absolute confidentiality. There will be no retaliation for such reporting.
- **Use our internal reporting channel:** whistleblowing@swisscontact.org

External reporting channel

Internal and external whistleblowers, such as suppliers and partners can report anonymous or namely by phone or online on Safecall's internet platform. The experts of Safecall receive complaints in over 170 languages and transmit them to the person in charge at Swisscontact. The confidentiality and anonymity of the informer are respected. Safecall provides the following contact options:

- International Free Phone Number: +800 7233 2255 or +44 191 516 7749
- Online: www.safecall.co.uk/report