

1. NIMD INTEGRITY POLICY

Introduction

This policy document sets out NIMD's Integrity Policy. NIMD aims for the highest possible integrity in its contact with partners, suppliers, clients, among NIMD staff and in respect of business property. The key values within our staff policy - justice, legal security, safe environment, openness and clarity, individual & shared responsibility and room for initiative, diversity and creativity - also serve as a point of departure for the Integrity Policy.

Integrity cannot be introduced just by drawing up a number of rules of conduct. Attitude and 'wanting to do things properly' are also crucial aspects of integrity. In our view, there are two sides to the integrity coin: a hard side and a soft side. The hard side consists of regulations, both internal and external, and the soft side refers to the organisational culture at NIMD. Integrity in our organisation implies displaying an open and respectful attitude towards each other, respecting and embracing differences, being honest and accountable, avoiding deception, etc. It goes without saying that superiors set a good example through exemplary conduct.

Apart from the content of the Integrity Policy, NIMD employees are obliged to comply with generally accepted legal requirements and abide by common social standards and values. This Integrity Policy consists of a code of conduct, complaints procedure and a whistleblowing procedure.

1.1 Key values

- Justice
- (Legal) security
- Openness and clarity
- Individual & shared responsibility
- Room for initiative
- Diversity
- Creativity
- Courage
- Safe environment

1.2 Evaluation and revision

This policy will be periodically reviewed and amended to ensure that it remains relevant to the needs and realities of the organisation. The Head of Finance & Support at headquarters in The Hague will lead this review process. The findings will be reported in the Annual Report and the members of the Staff representatives (PVT) and the Supervisory Council are notified.

Any amendments to the policy will be legally binding for all employees from the time that the updated document has been disseminated.

New employees are explicitly informed of the Integrity Policy during the employment conditions interview. By signing the employment contract, they also sign for receipt of and to indicate agreement

with the existing Integrity Policy documents. The Integrity Policy will also be part of the Performance Management Cycle.

2. CODE OF CONDUCT

General note

Each NIMD office must redefine specific aspects if the local context requires such an amendment of this code. These amendments need approval from Head of Finance and Support at HQ.

Scope:

The Code of Conduct applies to all staff, including managers and coordinators; full-time, part-time, temporary, permanent, in The Hague (HQ) or country offices (CO) staff; job applicants; interns; student workers and volunteers

Article 2.1 Recruitment and selection

During recruitment and selection, an applicant's integrity and attitude to integrity risks inherent in the position applied for are important considerations. This can be checked by asking questions with regards to integrity to the applicant and/or as part of a reference check.

Article 2.2 Discharge of duties

Every employee shall discharge the duties entrusted to him/her with the highest degree of professionalism, ownership, integrity and loyalty to NIMD. Every employee shall comply with all internal and external regulations and lawful instructions regarding the work of NIMD given to him/her by the Executive Director, the Country Representative or his/her manager, as the case may be. Every employee shall devote his/her working hours to the work of NIMD, and may not undertake private work during working hours, unless duly authorised.

Article 2.3 Other positions

Employees are obliged to communicate their intention to carry out paid or unpaid (but possibly conflicting) work elsewhere to the employer in writing. If this work presents an issue in respect of the proper execution of the employee's work the employer must, within a month of said communication and after addressing the employee, notify the employee in writing, stating reasons that the employee is not permitted to perform that other work.

New employees who were already performing other work and who do not terminate that work after being employed by NIMD must communicate that fact to the HR department before signing the employment contract. If this work is conflicting with the NIMD work, the NIMD employment contract cannot be signed.

Article 2.4 Conflict of interest

No employee shall, while in the employment of NIMD, engage in any business or activity that would undermine his/her performance or conflict with the interests of the organisation. NIMD shall as a rule not enter into agreements with or procure goods or services from employees, directors, supervisory council or their relatives (within the local context), apart from in exceptional circumstances where it is demonstrated to be in the best interest of NIMD and no viable alternatives are available.

No employee or Executive Director/ the Country Representative may be involved in any decision-making process, or seek in any way to influence it, where he/she may be in a position to gain privately from the decision or his/her relatives are involved.

All employees shall disclose forthwith any potential conflict of interest and seek approval before proceeding.

Article 2.5 Professionalism

Work performed in the countries in which we operate must be carried out with respect for the local culture, structures, laws and customs, insofar as these are not counter to international human rights standards, humanitarian law or NIMD values.

Any dealings with partners must be professional and strictly business-related.

All employees shall act at all times in a manner that enhances the reputation and wellbeing of NIMD as an impartial and independent organization. No employee shall act in a manner that could bring the reputation of NIMD into disrepute or otherwise jeopardise its good standing.

Article 2.6 Accepting gifts and benefits

Employees are not permitted to accept or demand gifts, remunerations, attendance fees or commissions, whether directly or indirectly, or to accept inheritances or testamentary gifts from persons with whom the employee only comes into contact by virtue of the employee's position. This applies to gifts of a value of EUR 50.00 or more, or any other amount formally registered in accordance with the local context. All gifts must be reported, even if they have a value of less than EUR 50.00. The HR department will register the accepted gifts in the personnel file.

Article 2.7 Bribes and other illegal payments

As a basic principle, NIMD does not condone the payment of bribes. This includes, but is not limited to, illegal charges imposed for the release of goods from customs, taxes levied by local authorities in addition to or in excess of the legal maximum or illegal charges imposed by local authorities in exchange for mission registration, programme approval and visa or work permits. No employee will accept a bribe of any kind.

Article 2.8 Corruption and fraud

NIMD has zero tolerance for any form of corruption, theft, fraud and dishonesty.

No employee may falsify information or otherwise provide false information. An employee who engages in such illegal actions shall be subject to summary dismissal. An employee who has caused a loss to NIMD through such illegal actions may additionally be held liable for reimbursing the cost of the loss or damage caused.

NIMD commits to protect individuals who wish to report or protest the occurrence of irregularities and malpractices which undermine the corporate objectives. These individuals can make use of the whistleblowing procedure that is part of this policy.

Article 2.9 Foreign trips

Invitations by third parties to go on a foreign trip must be reported to the first manager in line. The manager will determine whether the trip serves a functional purpose, and the invitation may only be accepted if that is the case. Travel and accommodation expenses are claimed back through the normal expense claims.

Article 2.10 Use of company facilities

NIMD property, equipment and other assets may only be used for the work of the organisation, unless otherwise authorised in writing by the Executive Director or the first manager in line, as the case may be. Taking home consumables, such as office supplies or snacks, without the explicit approval of a director or manager is not permitted and is considered theft.

All employees shall safeguard all property and materials entrusted to them and exercise utmost care in their use.

Article 2.11 Alcohol and drugs

The possession or use of drugs or being under the influence of drugs or any other substances that influence behaviour during working hours is prohibited.

The possession or use of alcohol during working hours is prohibited unless explicitly authorised by a director or manager, such as during a reception, lunch or dinner. For a meeting hosted by NIMD where alcohol is served the responsibility for alcohol consumption lies with the user and in all cases a responsible attitude toward the use of it is expected.

The consumption of alcohol during business trips should be kept to a minimum, and the employee must be aware of his/her status as a representative.

Article 2.12 Mutual respect, non-discrimination and child protection

NIMD employees are judged on their performance and proven competencies. Discrimination on the grounds of ethnicity, religion or personal beliefs, political opinion, age, gender, disability, sexual orientation or otherwise is prohibited. Every employee shall conduct himself/herself with courtesy, respect and integrity towards all persons in the course of performing his/her work. No employee may discriminate against any other person.

No employee may abuse or deliberately intimidate any other person. No employee may make sexual advances where he/she knows or ought to know that the approach is unwelcome, or in any other way sexually harass or abuse another person. In general workplace harassment will not be tolerated, and abuse of power is unacceptable. In addition, any relations with colleagues must be reported to HR.

Aggression and violence are not tolerated.

NIMD staff must avoid any actions or behaviour involving children that may constitute poor practice or potentially abusive behaviour.

Article 2.13 Internet and email use

The internet and the email systems are available to employees for business use. This means that they should be used for work-related duties. Limited (occasional and brief) personal use is permitted, provided this does not disrupt normal daily activities and/or the technical infrastructure.

The employee is not permitted to gain unauthorised access to non-public sources on the internet and to visit internet sites that contain pornographic, racist, discriminating, insulting or offensive material. Employees are also not permitted to download and install such content.

The employee is not permitted to use the email system for spamming, sending messages of a pornographic, sexually or otherwise harassing, racist, discriminating, insulting or offensive nature or messages that incite hate and/or violence or may do so.

Content monitoring will only take place in the event of compelling reasons. If an employee is suspected of violating the rules, monitoring may only be performed by the Executive Director for a fixed (short) period and is limited to internet and email traffic data.

When data traffic monitoring has to be performed by the IT staff at NIMD, the task must be authorised by the Executive Director. Such a decision clearly indicates when this temporary authorisation ends. An intention to monitor the content of email is communicated in advance to the employee concerned, unless this is not reasonably possible.

If an employee is found to have made unauthorised use of internet or email he/she will immediately be called to account by the superior and measures will be taken, depending on the nature of the abuse.

Article 2.14 Social media use

Private use of social media is limited allowed during working hours. If you use social media:

- Realize that the information you put on the internet can be read by everyone (also for example by competitors or opponents of NIMD).
- Never put information on the internet that could cause harm to NIMD.
- Always take into account the privacy settings of communities, blogs etc. We advise you to change these settings and limit the sharing of your information to your familiar circle of friends and to limit your visibility beyond that circle.
- Keep business and private information separate.
- Never place confidential or classified information on the internet.
- Never place internal information on the internet.
- If you post something about NIMD on a blog or forum, make sure that your opinion is recognizable as a personal opinion and avoid any impression that it is an official statement of NIMD.
- Do not share confidential or sensitive information about our country offices, customers, partners or suppliers.
- Take into account copyright, quotes or any other legal rights.

- Formulate correctly, do not distort facts, do not make obscene or otherwise insulting remarks.
- If you report a paid ancillary activity on the Internet, make sure that you have permission beforehand to perform this additional activity.

Article 2.15 Information

NIMD expects all employees to manage and report their business data in a reliable, honest and meticulous manner.

The employee has a duty of confidentiality regarding information that he/she learns of in his/her position and profession, insofar as such an obligation arises from the nature of the matter at hand or has been expressly imposed on the employee.

The employee shall respect the NIMD confidentiality clause in the employment agreement.

Questions from the media on such matters are dealt with in close cooperation with the NIMD communication department. Every employee of NIMD will sign a declaration that he/she will act in accordance with the NIMD confidentiality clause, and any breach of confidentiality will lead to disciplinary action.

Article 2.16 Privacy

NIMD handles all privacy-sensitive data from employees, partners and stakeholders in a reliable, honest and meticulous manner, in accordance with internal and legal privacy laws and regulations (AVG). Employees must also act in accordance with internal and legal privacy regulations. Data on employees is only made available as far as there is a necessity for it and only to those persons for whom this is relevant in terms of their position.

Final note

Management must maintain an open-door culture, and all staff has an obligation to report misconduct without fear of reprisal or retribution. Misconduct may prompt NIMD management to take disciplinary action after the facts have been established and all parties have been heard.

Document seen by:

Position:

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Date:

Location

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3. COMPLAINTS PROCEDURE

3.1 Dutch Law

Employers subject to Dutch Law (the Working Conditions Act – *Arbowet*) are obliged to implement a policy aimed at preventing workplace harassment and bullying. As NIMD is subjected to this law, this procedure is put in place. An important part of such a procedure is prevention, which may in part be achieved by providing information through courses or through documents issued by NIMD.

3.2 Applicability and scope:

This procedure applies to:

- Board members (both the Supervisory Council and the Advisory council)
- All staff, including managers and coordinators; full-time, part-time, temporary or permanent, in The Hague (HQ) or country offices (CO) staff; job applicants; interns; student workers and volunteers

3.3 Definitions:

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|----------------------------------|--|
| Employer | Netherlands Institute of Multiparty Democracy (NIMD) |
| Employee | The person who has entered into an employment agreement (including subcontractors) with NIMD. |
| Aggression and violence | Instances where an employee is experiencing physical or mental aggression or threats or attacks under circumstances that are directly related to the employment situation. |
| Bullying | All forms of intimidating behaviour of a structural nature perpetrated by one or more employees (colleagues or superiors) aimed at an employee or group of employees that are not in a position to defend themselves against such actions. |
| Sexual intimidation | Any form of verbal, non-verbal or physical behaviour with a sexual connotation that has as its purpose or consequence that a person's dignity is eroded, in particular when a threatening, hostile, insulting or humiliating situation is created. |
| Discrimination | Any behaviour where an employee is treated differently from another person that is in a comparable situation, on the basis of their religion, convictions, political outlook, race, gender, nationality, sexual orientation, marital status, age, disability or chronic illness, or where a seemingly neutral condition, measure or act unequally affects persons with a given religion, convictions, political outlook, race, gender, nationality, sexual orientation, marital status, age or with a disability or chronic illness. |
| Complainant | A person who makes a complaint against a person or persons to the confidential advisor or the external complaints board. |
| Confidential advisor (confidant) | A person who can be trusted and addressed on private, sensitive or secret matters relating to perceived acts of aggression, discrimination, bullying or sexual intimidation. |

External complaints board An official group of people (not employed by NIMD) who have been tasked with evaluating and ruling on a complaint relating to the above conduct.

3.4 Right of complaint

Every person who is confronted or could be confronted with inappropriate conduct within a work situation or as a result thereof can, whether or not through a confidential advisor, submit a complaint to the complaints board;

A complainant may not be prejudiced in his/her work or position within the company on the grounds of submitting a complaint of discrimination or other inappropriate conduct. Witnesses must also be protected and may not be prejudiced by virtue of giving testimony.

3.5 Obligation of confidentiality

Any person that is acting within the context of the complaints procedure or in their capacity as a confidential advisor is obliged to maintain confidentiality in regard of that knowledge and the confidential information that he/she has received in that respect.

3.6 Confidential advisor

Within NIMD there is an internal confidential advisor. The confidential advisor is appointed by the Director of NIMD in cooperation with the Employee Representative (PvT) and has adequate knowledge and expertise in terms of preventing and combating inappropriate conduct and transgressive behavior. The confidential advisor must be trusted by the staff and be easily approachable. The supervisory council will be informed about the appointment of the confidential advisor.

3.7 Duties and competences of the confidential advisor

The confidential advisor has the following duties, among others:

- He/she is a contact point for people that are confronted with inappropriate conduct in the workplace: sexual intimidation, discrimination, bullying, aggression and violence;
- He/she assists people with complaints dealing with sexual intimidation discrimination, bullying, aggression and violence and, where necessary, refers them on (to the authorities or another service);
- He/she shall take action in terms of finding a solution to the situation when a complaint is received. Action is only taken at the request of the complainant or with his/her consent;
- He/she provides the complainant with advice, both solicited and unsolicited, on what steps to take next;
- At the complainant's request, he/she assists that person to submit a complaint and supports them when it is brought before the complaints board;
- He/she ensures that the complainant is not prejudiced as a result of making the complaint and that the complaint is properly dealt with;
- He/she provides the complaints board and the employer with information and advises them in respect of preventing and combating inappropriate conduct: sexual intimidation, discrimination, bullying, aggression and violence;

- The confidential advisor releases an annual anonymised report on the nature and scope of the complaints about inappropriate conduct: sexual intimidation, discrimination, bullying, aggression and violence ;
- In extreme cases where the confidential advisor establishes that serious violence and/or sexual abuse is being committed, he/she is not bound by the obligation of confidentiality.

3.8 Competences:

- Those facilities required to properly perform his/her tasks are made available to the confidential advisor;
- The confidential advisor is offered the option to take courses that are necessary for increasing his/her knowledge and expertise in respect of preventing and combating inappropriate conduct: sexual intimidation, discrimination, bullying, aggression and violence;
- The confidential advisor is authorised to obtain the information required to properly perform his/her tasks;
- Everybody that falls under the scope of the code of conduct is obliged to speak to the confidential advisor and to provide him/her with information.

3.9 Accountability and protection of the confidential advisor

- In performing his/her tasks the confidential advisor is solely accountable to the employer;
- The confidential advisor is in all other respects independent and enjoys protection.

3.10 Complaints board

The organisation has an external complaints board. The complaints board is an independent board that can be engaged by staff when it comes to complaints involving forms of inappropriate conduct.

3.11 General

- The complaints board consists of at least three members: the chairperson and two others.
- The chairperson and the other members are appointed by the employer and at the nomination of the Employee Representation (PvT).
- The board must have legal expertise (an external expert can also be a member of the board, or can be engaged on an ad hoc basis);
- The board members must deal with the complaint in an unprejudiced and unbiased manner.

3.12 Tasks of the complaints board

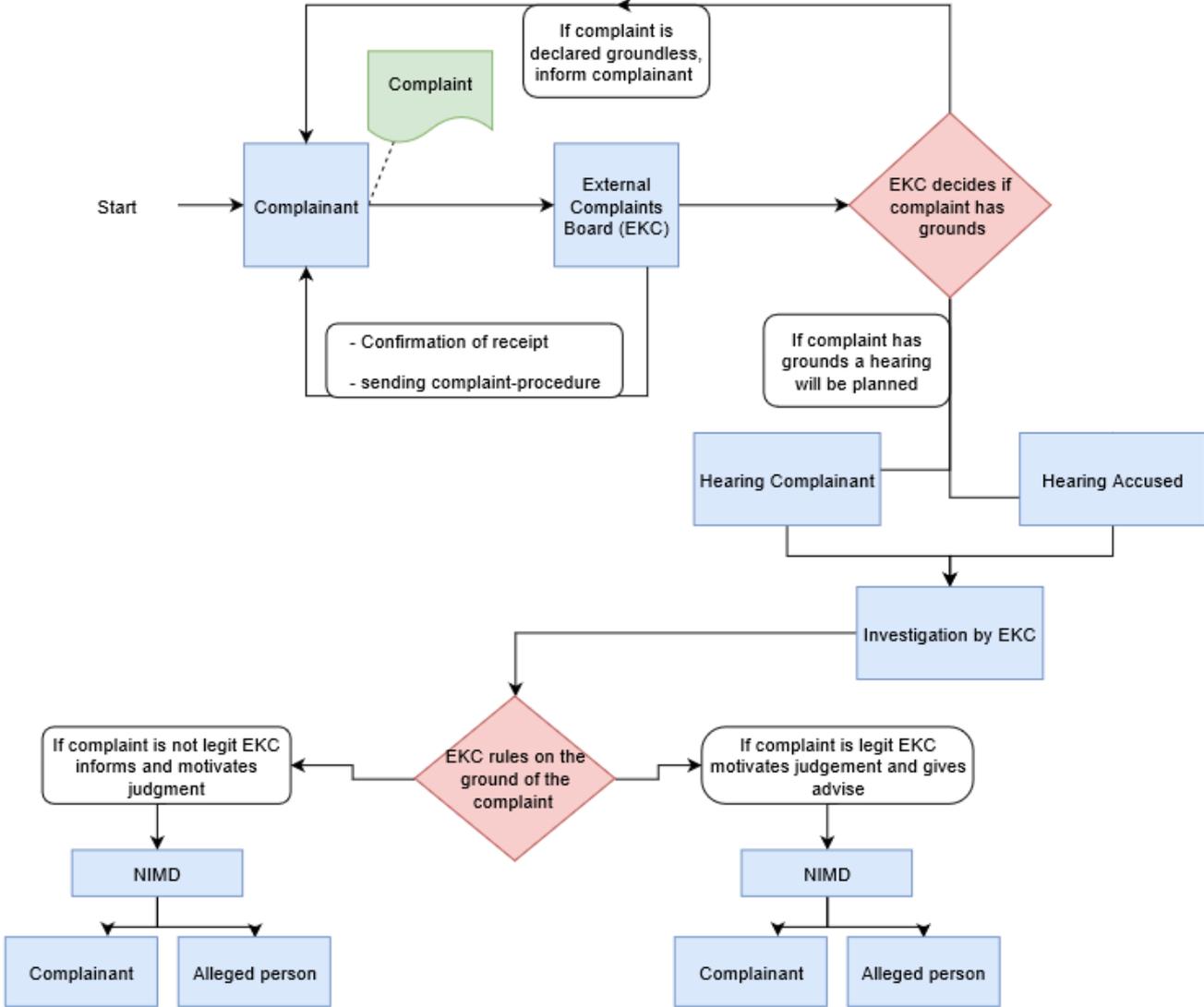
- The complaints board deals with the complaint concerning inappropriate conduct: sexual intimidation, discrimination, bullying, aggression and violence;
- The complaints board institutes a preliminary investigation into whether the complaint has grounds;
- The complaints board registers the nature and the extent of the complaints received and annually releases an anonymised report.

3.13 Complaints procedure

- The complaint is submitted in writing to the complaints board (where necessary, with the assistance of the confidential advisor);

- The notice of complaint/application contains: the name of the complainant, the name of the accused, a description of the complaint, the measures taken to date by the complainant, and the documents (evidence) related to the complaint.
- The complainant will receive confirmation that the complaint was received within two weeks;
- If there is reason to do so, the complaint can be submitted by more than one person, but they must be affected parties in respect of the complaint;
- If the complaint is declared groundless, the complaints board shall rule on it within four weeks;
- If it is found that the complaint has grounds, the accused shall receive a copy of the complaint within four weeks;
- The accused shall have the opportunity to send a written defence to the board within two weeks of receiving the complaint;
- Both the complainant and the accused are interviewed by the board. The complainant and the accused are interviewed in each other's presence, unless the board has well-founded reasons for interviewing them separately;
- The board is also authorised to interview other parties. Every person that falls under the scope of the code of conduct must respond to the board's request for an interview;
- The board compiles a report of every hearing and sends it to the complainant/accused within two weeks of that session as well as to other persons that were interviewed; the complainant and the accused have the opportunity to voice to the board their opinion of the report at a session to which the complainant and the accused are invited. These sessions are conducted separately.
- Once they are approved by the complainant or the accused, the other party is given the opportunity to read the reports. The reports are not handed over to the parties.
- The board's sessions are held in camera;
- The board rules, providing reasons, on the grounds of the complaint within two months of receiving the complaint. The board can extend that period by four weeks, after informing the complainant and the accused of that extension. The board can provide advice and recommendations in its ruling on the measures to be taken;
- The complaints board presents its report together with its ruling to the Director of NIMD and sends a copy thereof to the complainant and the accused; In case the accused is the Director, the report with its ruling will be send to the Supervisory Council;
- The board sends a copy of the ruling to the parties concerned;
- The party ultimately responsible (the employer) reaches a decision on the steps and measures to be taken or the sanctions to be applied within two weeks of the board's ruling.

Annex I: Overview Complaints procedure NIMD:



Timeline:



4. WHISTLEBLOWING PROCEDURE

NIMD seeks to attain the highest possible levels of (financial) management and accountability. The organisation has adopted a zero-tolerance policy towards for example any form of corruption or fraud. This is why NIMD has adopted a range of proactive measures to prevent and deter acts of corruption or fraud among its staff and staff of implementing partners, beneficiaries and service providers.

All staff are required to observe the highest standards of business and personal ethics when performing their duties and responsibilities. They are expected to be honest and maintain integrity in fulfilling their responsibilities and comply in full with all applicable laws and regulations.

This whistleblowing procedure is an important element for detecting dangerous, immoral or illegal practices and is consequently considered an essential component for achieving good corporate governance.

As part of our good governance practices, NIMD undertakes to protect individuals against disadvantage who wish to report or protest the occurrence of irregularities and malpractices that undermine the objectives of the organisation. NIMD employees are explicitly asked to report any suspected violations. Unless such is not deemed possible or advisable, complaints should first be submitted in writing to their immediate superior before employing the whistleblowing procedure. The staff of implementing partners, beneficiaries and service providers are encouraged to report violations or suspected violations initially to their regular contact person at NIMD before using the whistleblowing procedure to report the matter, unless they believe this will endanger them.

The superior or regular contact person ensures that the Executive Director or Country Representative is immediately notified of the reported suspected misuse. If the Executive Director or Country Representative is the subject of the report, the superior or regular contact person can submit his/her report to the Supervisory Board.

All reports received regarding irregularities at partner organisations funded by NIMD or at service providers will be handled in accordance with the provisions of the NIMD sanctions procedure, where applicable.

4.1. What is whistleblowing?

Under this procedure, 'whistleblowing' is defined as NIMD employees (both in The Hague and in country offices) and the staff of implementing partners, beneficiaries and service providers reporting dangerous, immoral or illegal practices which take place under the responsibility of NIMD. The public interest is at issue in these cases. Therefore the aim of this procedure is to encourage employees and others who have serious concerns about any aspect of NIMD's work to come forward and voice those concerns.

Employees are often the first to realise that there may be something seriously wrong within the organisation. Whistleblowing is viewed by NIMD as a positive act that can make a valuable contribution to NIMD's efficiency and long-term success. NIMD is committed to achieving the highest

possible standards of service and the highest possible ethical standards in public life and in everything the organisation does. To help achieve these standards it encourages freedom of speech.

If you are considering raising any concerns, please read this procedure first. It explains:

- the type of issues that can be raised
- how the person raising a concern will be protected from victimisation and harassment
- how to raise a concern, and
- what NIMD will do to follow up on a complaint

If you are unsure whether to use this procedure or want independent advice at any stage, you may contact the confidential advisor (confidential@NIMD.org) or write directly to whistleblower@NIMD.org.

4.2. What is the aim of the Whistleblowing procedure and when does it apply?

4.2.1. Aims of the procedure

The procedure is designed to ensure that you can raise your concerns about wrongdoing or malpractice within NIMD without fear of victimisation, subsequent discrimination, disadvantageous treatment or dismissal.

It is also intended to encourage and enable you to raise serious concerns **within** NIMD rather than ignoring a problem or 'blowing the whistle' concerning such issues to other parties.

This procedure aims to:

- Encourage you to feel confident in raising serious concerns at the earliest opportunity and to question and act upon concerns about practices.
- Provide a safe channel for you to raise those concerns and receive feedback on any action taken.
- Ensure that you receive a response to your concerns and that you are aware of how to pursue them if you are not satisfied.
- Reassure you that you will be protected from possible reprisals or victimisation if you have made any disclosures in good faith.

4.2.2. Scope of this procedure

This procedure is intended to enable those who become aware of any wrongdoing at NIMD that impacts on another person or service, to report their concerns at the earliest opportunity so that they can be properly investigated.

The Whistleblowing Procedure is not intended to replace existing procedures:

- If your concern relates to your own treatment as an employee, you should raise it under the existing complaints procedure (see above)
- If a client has a concern about services provided to him/her, it should be submitted as a complaint to NIMD

4.2.3. Who can raise concerns under this procedure?

The procedure applies to all:

- employees of NIMD
- employees of contractors working for NIMD, such as consultants
- employees of suppliers
- those providing services under a contract or other agreement with NIMD in their own premises, such as country offices or democracy schools

4.2.4. What should be reported?

Any serious concerns that you have about service provision or the conduct of officers or members of NIMD or others acting on behalf of NIMD that:

- make you feel uncomfortable in terms of established standards;
- fall below established standards of practice; or
- are improper behaviour.

These might relate to:

- conduct which is an offence or a breach of the law (a criminal offence has been committed or a party fails to comply with any other legal obligation)
- disclosures related to miscarriages of justice
- racial, sexual, disability or any other form of discrimination
- health and safety of the public and/or other employees
- environmental degradation
- unauthorised use of public funds or other assets
- possible fraud and corruption
- neglect or abuse of clients, or
- other unethical conduct

This list is not exhaustive.

4.3. Protecting the whistleblower within NIMD

4.3.1. Your legal rights as NIMD Employee

This procedure has been written with due regard for the The Whistleblowers Authority Act of 1 July 2016 (the Act), which protects employees of NIMD making disclosures about specific matters of concern, when those disclosures are made in accordance with the Act's provisions and in the public interest.

The Act makes it unlawful for NIMD to dismiss anyone or allow them to be victimised because they have made an appropriate lawful disclosure in accordance with the Act.

On rare occasions, a case might arise in which the employee reporting has also participated in the action causing concern. In such a case it is in the employee's interest to come clean as soon as possible. NIMD cannot undertake, that is, shall take no action against such an employee, but the fact that the individual came forward may be taken into account.

4.3.2. Harassment or victimisation

NIMD is committed to good practices and high standards and to being supportive of you as an employee or an individual associated with NIMD in any other manner.

NIMD recognises that the decision to report a concern can be a difficult one to make. If you honestly and reasonably believe that what you are saying is true, you should have nothing to fear because you will be doing your duty to your employer, your colleagues and those for whom you are providing a service.

NIMD will not tolerate any harassment or victimisation of a whistleblower (including informal pressure) and will take appropriate action to protect you against any disadvantage when you raise a concern in good faith and will treat such harassment as a serious disciplinary offence that will be dealt with under the disciplinary rules and procedure.

4.3.3. Support for the whistleblower

Throughout this process:

- you will be given full support from senior management (in case the matter is related to the Executive Director, the support will be provided by the supervisory council).
- your concerns will be taken seriously, and
- NIMD will do all it can to assist you throughout the investigation

If appropriate, NIMD will consider temporarily redeploying you for the period of the investigation.

For those who are not NIMD employees, NIMD will endeavour to provide appropriate advice and support wherever possible.

4.3.4. Confidentiality

All concerns will be dealt with confidentially and every effort will be made to not reveal your identity, should you wish it to remain confidential. If disciplinary or other proceedings follow the investigation, it may not be possible to take action as a result of your disclosure without your assistance, so you may be asked to come forward as a witness. If you agree to this, you will be offered advice and support.

4.3.5. Anonymous allegations

This procedure encourages you to put your name to your allegations whenever possible. If you do not tell us who you are it will be much more difficult for us to protect you or to give you feedback. This procedure is not suited to concerns raised anonymously. Concerns expressed anonymously are much less effective, but they may still be reviewed, at the discretion of NIMD.

In exercising this discretion, the factors to be taken into account include:

- the seriousness of the issue raised
- the credibility of the concern, and
- the likelihood of confirming the allegation from other sources

For the formal reporting of suspected irregularities, NIMD makes use of a unique email address: whistle-blower@NIMD.org. This email address is accessible for the Management Team of NIMD and will be monitored by the Head of Finance & Support and shared with stakeholders and employees as well as in programme and project contracts.

4.3.6. False allegations

If you make an allegation in good faith and reasonably believe it to be true, but it is not confirmed by the investigation, NIMD will recognise your concern and there will be no further consequences for you. If, however, you make an allegation frivolously, maliciously or for personal gain, appropriate action, including disciplinary action, may be taken.

4.4. Raising a concern

4.4.1. Who should you raise your concern with?

This will depend on the seriousness and sensitivity of the issues involved and who is suspected of wrongdoing. Under normal conditions, you can raise your concerns with:

- Your line manager
- An Management Team member
- Your contact person within NIMD
- Or use the whistleblower email address listed above

If, under exceptional circumstances, your concern relates to the Executive Director of NIMD, then it should be raised with the Supervisory Board, which will decide on how the investigation will proceed. This may include an external investigation.

If you are unsure who to contact, you may contact the confidential counsellor at:

4.4.2. How to raise a concern

You may raise your concern by telephone, in person or in writing. The earlier you raise your concern, the easier it is to take action. You will need to provide the following information:

- the nature of your concern and why you believe it to be true
- the background and history of the concern (giving relevant dates)

Although you are not expected to prove beyond doubt that your suspicion is true, you will need to demonstrate to the person you contact that you have a genuine concern relating to suspected wrongdoing or malpractice within NIMD and that there are reasonable grounds for your concern.

You may wish to consider discussing your concern with a colleague first. You may find it easier to raise the matter if there are two or more of you who have had the same experience or concerns.

You may invite your trade union, professional association representative or a friend to be present for support during any meetings or interviews in connection with the concerns you have raised.

4.5. What NIMD will do

NIMD will respond to your concerns as quickly as possible. Remember that the investigation of your concerns is not the same as either accepting or rejecting them.

The overriding principle for NIMD will be that of the public interest. In order to be fair to all employees, including those who may be wrongly or erroneously accused, initial inquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take.

The investigation may need to be carried out under terms of strict confidentiality, i.e. by not informing the subject of the complaint until it becomes necessary to do so or if such becomes necessary. In certain cases, however, such as allegations of ill-treatment of others, immediate suspension from work may have to be considered. Protection of others is paramount in all cases.

Where appropriate, the matters raised may:

- be investigated by management, an internal auditor, or through the disciplinary/grievance process
- be referred to the police
- be referred to the external auditor
- be referred to and subjected to established child protection/abuse procedures
- form the subject of an independent inquiry

Within ten working days of a concern being raised, the person investigating your concern will write to you:

- acknowledging that the concern has been received
- indicating how NIMD proposes to deal with the matter
- supplying you with information on staff support mechanisms
- telling you whether further investigation will take place and if not, why not.

The level of contact between you and the officers considering the issues will depend on the nature of the matters raised, the potential difficulties involved and the clarity of your information. It is likely that you will be interviewed to ensure that your disclosure is fully understood.

Any meeting can be arranged away from your workplace, if you wish, and a union or professional association representative or a friend may accompany you to provide support.

NIMD will do what it can to minimise any difficulties that you may experience as a result of raising a concern. For instance, if you are asked to give evidence in criminal or disciplinary proceedings, NIMD will arrange for you to receive appropriate advice and support.

It is our task to assure you that your disclosure has been properly addressed. Unless there are any legal reasons why this cannot be done, you will be kept informed of the progress and outcome of any investigation.

4.6. The Responsible Officer

The Head of Finance & Support has overall responsibility for the maintenance and execution of this procedure.

4.7. How the matter can be taken further

This procedure is intended to provide you with a way to raise concerns within NIMD. NIMD hopes you will be satisfied with any action taken. If you are not satisfied, and you feel it is appropriate, you can take the matter to parties outside of NIMD.

This procedure **does not** prevent you from seeking legal advice yourself.