

CBM Global Policy: Whistleblowing

June 2022



Introduction and purpose

CBM Global is committed to a culture of integrity, transparency and accountability in keeping with its organisational values. All directors, staff, Board members, programme partners or volunteers are expected to observe high standards of business and personal ethics in the conduct of their duties and responsibilities.

This policy is intended to encourage persons associated with CBM Global to report suspected or actual occurrence(s) of illegal, unethical or inappropriate events (behaviours or practices) without retribution.

The whistleblowing policy applies to all worldwide activities and operations of CBM Global. This does not include national operations of the Members for which national whistleblowing policies apply.

Definitions

A **whistleblower** is a person who exposes or reveals wrongdoing within an organization to those in positions of authority. Whistleblowers generally report information or allegations internally and, only in extreme cases, seek external redress.

A whistleblower is generally a person associated with CBM Global, being a current or former workplace participant, a current or former programme partner participant or a Board member. Workplace participants include anyone engaged in work for CBM Global. This includes full time, part time and casual employees, external contractors and volunteers.

For a whistleblower to report a **wrongdoing or improper conduct**, they should reasonably believe two things:

1. That they are acting in the public interest and/or in the interests of CBM Global. Personal grievances and complaints which are not covered by this policy are addressed by way of a separate grievance policy.
2. That the disclosure relates to past, present or future wrongdoing or improper conduct which is reasonably believed to be:
 - dishonest, illegal, fraudulent or corrupt;
 - unethical, including being in breach of CBM Global's Code of Conduct;
 - involving inappropriate use of CBM Global's funds, assets or data;
 - involving the sexual exploitation, abuse or harassment of any person;
 - endangering the health, safety, or safeguarding of any workplace participant, program partner participant or any external community member;
 - damaging to CBM Global's reputation; or
 - involving the concealment or suppression of information relating to any wrongdoing.

Policy Statement

1. A whistleblower shall receive no retaliation or retribution for a report that was provided in good faith and not done with malice to damage any person or the organisation. Anyone who retaliates against the whistleblower will be subject to disciplinary action, including termination of Board or employee or other existing contractual relationship.
2. Any allegations which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.
3. Crimes against person or property, such as assault, rape, burglary, etc., should immediately be reported to local law enforcement personnel.
4. Supervisors, managers and/or Board members who receive whistleblower reports must promptly act to ensure the appropriate process, as provided in the next section below, is adopted.
5. The whistleblower shall receive an acknowledgement within seven business days of the initial report, providing them current information regarding the investigation. All whistleblower matters will be expeditiously addressed and, under normal circumstances, the final outcome/resolution of the matter would be reported not later than sixty business days from the date of the initial report.
6. If the investigation of a report is not to the whistleblower's satisfaction, they have the right to report the matter to the Chair of CBM Global's Audit, Risk and Finance Committee.
7. The identity of the whistleblower, if known, shall remain confidential to those persons directly involved in investigating such reports, unless the issue requires investigation by law enforcement (if so, the whistleblower will be duly informed).

Process for making a whistleblower report

A whistleblower should promptly report a suspected or actual wrongdoing or improper conduct. All reports received will be treated with the strictest confidence and where anonymity is desired, suitable mechanisms are available for reporting as provided below.

1. If a whistleblower prefers to submit their report **via a letter**, they could adopt either of two options, providing their name or anonymously:

TO: the CBM Global HR manager OR the CBM Global Internal Audit
Manager

Address:
CBM Global Disability Inclusion gGmbH
Dr.-Werner-Freyberg-Str. 7
69514 Laudendach, Germany

2. A whistleblower could also write to CBM Global using the following **e-mail address**:
whistleblowing@cbm-global.org

3. CBM Global's public **website** also provides a facility for whistleblowers to submit their reports anonymously. Kindly use the CBM Global website at: www.cbm-global.org

Reference Documents

- CBM Global Code of Conduct
- CBM Global Policy on Prevention of Fraud & Corruption
- CBM Global Policy on Counter Terrorism & Anti Money Laundering
- CBM Global Policy on Safeguarding of Children and Adults-at-Risk
- CBM Global Policy on Protection from Sexual Exploitation, Abuse and Harassment
- CBM Global Policy on Programme Feedback and Complaints
- CBM Global Process Guide Whistleblowing

CBM Global Disability Inclusion

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