

CBM Global Policy Whistleblowing

May 2025



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.

Definition

A **whistleblower** is a person who exposes or reveals wrongdoing within an organization to those in positions of authority.

A whistleblower is **generally a person associated with CBM Global**, being a current or former employee, external contractor, a volunteer, a current or former partner staff member or programme participant, or a Board member.

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 are not covered by this policy and are addressed by way of the separate CBM Global 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 sexual exploitation, abuse or harassment of any person;
 - endangering the health, safety, or safeguarding of any employee, volunteer, programme 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 made with malice to damage any person or the organization. Anyone who retaliates against the whistleblower will be subject to

disciplinary action, including termination of Board, 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. 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.
4. The whistleblower shall receive **an acknowledgement within seven business days of the initial report** and shall be kept informed where appropriate 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**.
5. 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**.
6. 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 consulted).

Process for reporting a whistleblowing case

All whistleblowing reports received will be treated with the utmost confidence. Whistleblowers are encouraged to provide their name and/or contact details to facilitate communication and investigation, but they have the option to remain anonymous should they prefer so. Where anonymity is desired, **suitable mechanisms are available for reporting** as provided below.

1. A whistleblower can submit their report **via letter** to the CBM Global HR manager OR the CBM Global Internal Audit Manager at the following postal address:

CBM Global Disability Inclusion gGmbH
Dr. Werner-Freyberg-Str. 7
69514 Laudenbach
Germany
2. A whistleblower can write to CBM Global using the following **e-mail** address: whistleblowing@cbm-global.org. This email account is managed by the CBM Global Internal Audit Manager.
3. CBM Global's public **website** provides a facility for whistleblowers to submit their reports (anonymously if so desired) from this web page: <https://cbm-global.org/contact-us>. This page gives access to the **whistleblowing portal** which is monitored by the Internal Audit Manager. Note that a dedicated portal for safeguarding cases is available from the same page. The safeguarding portal is monitored by the Global Safeguarding Manager.

Key references and supporting documents

All documents mentioned above are available to CBM Global Federation staff on [Global Connect](#). Documents that are relevant for external audiences can be found on www.cbm-global.org.

- CBM Global Code of Conduct
- CBM Global Policy - Prevention of Corruption & Fraud
- CBM Global Policy - Counter Terrorism & Anti Money Laundering
- CBM Global Policy - Safeguarding
- CBM Global Policy - Grievance (internal)
- CBM Global Policy - Programme Feedback and Complaints
- CBM Global Process Guide Whistleblowing (internal)