

WHISTLEBLOWER POLICY

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1. Purpose of the Whistleblower Policy

This policy intends to support, underscore and complement practices of risk and compliance management in the existing ethics framework of Transparency Maldives (TM). It underscores and complements the TM Code of Conduct.

TM is engaged in an environment with a particular concern for transparency and integrity. We are dedicated to raising awareness of the damaging consequences of corruption, and to advancing the values of integrity, accountability and transparency.

The TM Board and management are committed to hear any concern an associate of TM may have relating to a serious risk to our values – in particular transparency and integrity – such as a suspicion of fraud or corruption in relation to our staff or organisation.

On the basis of this commitment, this policy is set up to outline the procedures for reporting, processing information, and how potentially conflicting rights and duties will be safeguarded.

2. Scope of the Whistleblower Policy

This policy applies to misconduct and wrongdoing such as acts of a fraudulent, dangerous or criminal nature, incidences of corruption or any other serious reputational risk for TM, and suspicion thereof.

All individuals working under any form of contract or agreement with TM, including, but not limited to, full- and part-time employees, interns, contractors, volunteers, advisors and consultants (hereafter: associates), can use this policy to raise concerns about any of the issues mentioned above.

This policy complements TM's related policies and procedures such as the Code of Conduct.

In case of doubt, please use the procedures explained below rather than staying silent.

3. Disclosures under this Policy

You can make a disclosure under this Policy if you have genuine concerns relating to any malpractice, or suspected malpractice, including, but not limited to, the following areas:

- Criminal activity;
- Miscarriages of justice;
- Practices endangering health and safety;
- Practices damaging the environment;
- Failure to comply with a legal obligation;
- Bribery and corruption;
- Financial malpractice, impropriety or fraud;
- Abuse of authority;
- Unauthorised use of public funds or property;
- Gross waste or mismanagement;
- Conflict of interest;
- Acts to cover up any of the above

TM needs to know about risks which immediately challenge its vision and values. If you have information on such a risk or believe that wrongdoing may have occurred, has occurred, or could occur, please make sure it is known and follow the procedures below on how to report it.

While it is understood that you may want to seek further information or consult with colleagues before making a report, please avoid unnecessarily sharing the identity of individuals affected by your report to colleagues, undertaking your own investigations, or collecting evidence before contacting a responsible person.

The goal of this policy is to help TM address problems before or as soon as they arise. For that reason, it is important that a responsible person is advised of a concern quickly so that s/he can undertake a fair, impartial and prompt examination of matters brought to his or her attention.

4. How and to Whom to Report: Roles and Responsibilities

A committee shall be set up within TM to look into matters reported under this Policy. The Committee shall consist of 1 member from the Board of Directors, 1 member from the TM management, and 1 member for the general staff.

If you have a concern relating to any malpractice or suspected malpractice, you are encouraged to raise it with the Committee. If you are uncomfortable to speak with the Committee for whatever reason, or if this is not practical, you may report to any member of the Board. These recipients have the duty to ensure appropriate follow-up as outlined under 8.

5. External reporting

Under the Whistleblower Protection Act of Maldives you also have an option to make a good faith report to the Whistleblower Protection Unit – usually only after available internal reporting channels have failed.

6. Confidentiality, Anonymity

Your report and the information contained in it, as well as your identity (if you choose to share it) will be treated confidentially.

You have the possibility to report anonymously, i.e. without disclosing your personal data to anybody. Please be aware that investigations tend to be more difficult in this case because TM may need your feedback – and you may need it, too. It may also be impossible to resolve a concern without revealing your identity, for example if you are the only person who is privy to the information. Similarly, it could turn out that the information is in fact no business secret and needs to be public or must be disclosed to those whose personal data is concerned.

This notwithstanding, your identity will not be revealed without prior written permission unless required to do so by law.

7. Assessment, Review or Investigation

Your concern will find a response. While you may choose to contact the most appropriate person internally in person, please consider providing a written outline of your concern, because this will facilitate a more formal assessment.

You will receive an initial response to your report within five working days after receipt of the information. While TM will endeavour to show that your concern has been fully considered and led to the due consequences, an early response may be limited to giving you an idea of next steps and a probable timeline. Within 30 working days you will receive an update and feedback on the Committee's initial assessment of the investigation.

Whenever possible, you will receive feedback on the outcome of any investigation.

8. Whistleblower Protection

If you report a concern, you are not required to prove that your report is true. No action will be taken against you in case the information in your report cannot be proven, or, while proven, may have an innocent explanation - provided that you acted in good faith. If, after making a report, you find additional relevant information, you are strongly encouraged to also report this to TM, regardless whether this information supports or modifies your original report.

TM will make all efforts to protect you from any form of retaliation, disadvantage or discrimination at the workplace linked to or resulting from your report.

Any individual within the organisation who retaliates against someone who has reported a concern under this policy, or who has cooperated in the investigation of a concern, is subject to discipline. Such retaliation will be a violation of the TM Code of Conduct, which stipulates that TM staff treat each other with respect and consideration. It may also be a violation of the employment contract with due sanctions.

