



WHISTLEBLOWER PROTECTION POLICY

International Women's Federation of Commerce and Industry (IWFCI)
- Mongolia Chapter

[DATE OF APPROVAL: 09/05/2024]

WHISTLEBLOWER PROTECTION POLICY

1. Introduction

- 1.1 Whistleblower policies are critical tools for protecting individuals who report activities believed to be illegal, dishonest, unethical, or otherwise improper.
- 1.2 Whistle-Blower means for the purposes of this policy, a whistle-blower is a type of complainant, not the survivor, who is a staff member, intern, volunteer or anyone who reports illegal, dishonest, misconduct, including SEA, fraud, theft, corruption money laundering. As such, he or she may be entitled to protection under specified terms.

2. Purpose of the policy

This policy aims to:

- a. Encourage our employees and the third parties who interact with us or our programmes to raise concerns of malpractice at the earliest opportunity;
- b. Inform our employees and third parties of the avenues of raising concerns and what to expect after they raise their concerns;
- c. Assure those who raise concerns of protection from possible reprisal and victimization;
- d. Provide for a culture of zero tolerance towards fraud, SEA and any malpractice or wrongdoing;
- e. Explain what qualifies as a whistle-blow and provides guidelines on how to report a concern;
- f. Provides a platform to disclose concerns of malpractices within the organization;
- g. Mitigate against any fraud, SEA, operational or regulatory risk that could lead to potential financial loss or damage to The International Women's Federation of Commerce and Industry (IWFCI) – Mongolia's reputation.

3. Scope of the policy

- 3.1 This policy applies to The International Women's Federation of Commerce and Industry (IWFCI) – Mongolia's staff, partners, suppliers, beneficiaries and third parties/associated persons to whom we have contractual or legal obligations.
- 3.2 IWFCI–Mongolia considers reportable unethical behavior or malpractice to include:
 - a. Safeguarding concerns i.e. concerns of sexual exploitation, abuse and harassment (as are more extensively defined in the PSEA Policy);
 - b. Failure to comply with IWFCI–Mongolia's policies and procedures;
 - c. A criminal offence that has been committed, is being committed or is likely to be committed; this includes fraud, theft, corruption money laundering or SEA;
 - d. Failure to comply with legal obligations;
 - e. A miscarriage of justice that has occurred or is likely to occur;
 - f. Dangers to health and safety;
 - g. Damage to the environment;
 - h. Deliberate concealment of any of the above malpractice or unethical conduct.
- 3.3 A whistleblowing concern can either be made confidentially or anonymously:

- a. **Confidential whistleblowing** - the whistle-blower's name is known but will not be disclosed, without their consent, unless required by law.
 - b. **Anonymous whistleblowing** - the whistleblower does not identify themselves to anyone at any stage.
- 3.4 If a whistleblowing concern is made anonymously, enough information must be provided to facilitate a thorough investigation into the allegations. While a whistleblower has every right to remain anonymous, they are encouraged to identify themselves, if they feel comfortable to do so. It will not be possible for IWFCI–Mongolia to provide a whistleblower with feedback or protection unless it knows his or her identity.

4. IWFCI–Mongolia's whistleblowing hotline

- 4.1 IWFCI–Mongolia's whistleblowing hotlines are managed by a trusted, independent party which guarantees confidentiality and ensures anonymity of the whistleblower. The hotline provides an anonymous reporting channel for unethical behavior in the workspace and combat occupational fraud, SEA and serves to strengthen the first line of defense in combatting any breaches to the Policy.

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- 4.2 The organization will not retaliate against a whistleblower. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, or poor work assignments and threats of physical harm. Any whistleblower who believes he/she is being retaliated against must contact the Director immediately. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.
- 4.3 Whistleblower protections are provided in two important areas: confidentiality and retaliation. Insofar as possible, the confidentiality of the whistleblower will be maintained. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law, and to provide accused individuals their legal rights of defense.
- 4.4 The organization may not discharge, threaten, or otherwise discriminate against an employee regarding the employee's compensation, terms, conditions, location, or privileges of employment.
- 4.5 The provisions of this policy do not:
- a. require the organization to compensate an employee for participation in a court action or in an investigation, hearing, or inquiry by a public body;
 - b. prohibit the organization from compensating an employee for participation in a court action or in an investigation, hearing, or inquiry by a public body;
 - c. authorize the disclosure of information that is legally required to be kept confidential; or
 - d. diminish or impair the rights of an employee under a collective bargaining agreement.

5. Procedures

- 5.1 If an employee has knowledge of or a concern of illegal or dishonest/fraudulent activity, SEA, the employee is to contact his/her immediate supervisor or the COO. All reports or concerns of SEA, illegal and dishonest activities will be promptly submitted by the receiving supervisor to COO, who is responsible for investigating and coordinating any necessary corrective action. Any concerns involving the COO should be reported to the President.
- 5.2 *(see Grievance form in IWFCI-Mongolia's PSEA Policy's annex)*
- 5.3 The whistleblower is not responsible for investigating the alleged illegal or dishonest activity, or for determining fault or corrective measures; appropriate management officials are charged with these responsibilities.
- 5.4 Examples of SEA, illegal or dishonest activities include violations of local or Mongolian law, contractual obligation, IWFCI-Mongolia's Code of conduct and PSEA Policy.