

Policies and Procedures Manual Human Resources Management The Syrian Network for Human Rights

Whistleblowing Policy

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Whistleblowing Policy

6.1 Policy: In alignment with the values and principles of the Syrian Network for Human Rights, The organization strives to manage its activities in accordance with its commitment to human rights, international principles, and its organizational culture at all times. The Syrian Network for Human Rights' organizational culture fosters a culture of integrity, morality, fulfillment, and perseverance.

However, we recognize that all institutions face the risk of errors in their activities from time to time or unintentional misconduct. Therefore, we believe it is our duty to take appropriate measures to identify such situations and try to remedy them. By encouraging a culture of openness and accountability within the Network, we believe we can help prevent such situations. We expect all employees to maintain the highest standards in accordance with our code of conduct and policies and to report any violations that do not meet these fundamental principles.

6.2 Objective: To provide clear guidance and detailed procedures for employees and stakeholders on how to report concerns about workplace practices or violations and to ensure compliance with laws, international humanitarian principles, and organizational policies and procedures.

6.3 Scope: This policy and its procedures apply to all employees of the organization and stakeholders.

6.4 Terms and Conditions:

This policy will be used if there is a genuine concern with reasonable grounds to believe that:

6.4.1 Suspected fraud or theft; or a criminal act is being committed, or likely to be committed; or a person is failing, or likely to fail, to comply with their legal obligations whether arising from law, regulation, or contract; or a false or

inaccurate claim is being, or is likely to be, made against a person associated with the Syrian Network for Human Rights. Any of the above is being deliberately concealed, or likely to be concealed.

6.4.2 In the context of the Syrian Network for Human Rights' activities, specific concerns that may fall under the provisions of this policy include, for example, breach of the Network's code of conduct/ethics, breach of confidentiality, financial fraud, and breach of international human rights. In general, this policy covers actions or omissions that can be considered illegal or contrary to established policies or procedures or beyond the individual's authority, and actions that may harm the reputation of the Syrian Network for Human Rights and conflicts of interest.

6.5 Terminology and Definitions:

6.5.1 Code of Conduct: A series of principles used as a guide to help employees fulfill ethical obligations for professional practice.

6.5.2 Comments Hotline: A multi-option entity that provides employees with an independent system to anonymously report unethical behaviors and questionable accounting matters (see: Code of Conduct).

6.5.3 Whistleblowing: The official name for whistleblowing is "Public Interest Disclosure." This means if you believe there are violations in your workplace, you can report it following the correct procedures, and your employment rights are protected.

6.5.4 Misconduct: This may be inappropriate behavior, illegal activity, or negligence by any person in the workplace.

6.5.5 Whistleblower Officer: A manager appointed by the Board to ensure compliance in the organization.

6.5.6 Conduct Committee: Comprises the Executive Director, a representative from the Board and/or the Operations Manager and/or the Human Resources Manager.

6.5.7 Whistleblower: Any employee, beneficiary, or stakeholder who witnesses any violations of the code of conduct or any legal or organizational policy and wishes to report this violation or disclose this issue.

6.5.8 Organizational Policies and Procedures: Internal policies, procedures, and standards of the organization.

6.5.9 Investigation Team: A team appointed based on an assignment by the Conduct Committee to investigate the complaint and propose corrective actions.

6.6 Responsibilities:

6.6.1 The Whistleblower Officer is responsible for overseeing and implementing the Whistleblowing Policy, monitoring and reviewing the policy process, and recommending any internal changes resulting from investigations into complaints under the policy.

6.6.2 The management of the Syrian Network for Human Rights is responsible for building and maintaining a culture of compliance through leading by example (using their behavior as a model for all employees) and encouraging employees to raise questions and concerns related to integrity.

6.6.3 All Syrian Network for Human Rights employees are responsible for adhering to this policy.

6.7 Non-disclosure

6.7.1 The Syrian Network for Human Rights recognizes that issues reported under this policy may involve highly sensitive and confidential matters, and whistleblowers may prefer to disclose information anonymously. However, The organization regrets that it cannot guarantee the investigation of all anonymous allegations. Proper investigation may be impossible if the investigator cannot obtain further information, provide feedback, or verify if the disclosure was made in good faith. Whistleblowers are preferred to reveal their identities to the Whistleblower Officer, and measures can be taken to maintain

confidentiality and protect anonymity if appropriate (see below on confidentiality).

6.7.2 All reported issues will be handled confidentially and anonymously, except in rare cases requiring external investigation by relevant government authorities.

6.7.3 Only those who need to know will be involved in the investigation or know about it.

6.7.4 The Syrian Network for Human Rights recognizes that there may be matters that cannot be dealt with internally and which require notification and involvement of external parties, whether during or after our investigation. The organization will strive to inform whistleblowers if a referral to an external authority is about to occur or has already occurred, although The organization may need to make such a referral without the knowledge or consent of the whistleblowers if it deems appropriate.

6.8 Confidentiality

6.8.1 Every effort will be made to maintain the confidentiality of the identity of whistleblowers under this policy, at least until any formal investigation is conducted. To avoid jeopardizing the investigation into the alleged misconduct, whistleblowers are expected to maintain the confidentiality of the fact that they have raised their concerns, the nature of the issue, and the identity of those involved. However, circumstances may arise, due to the nature of the investigation or disclosure, where it is necessary to reveal the identity of the whistleblowers. This could occur in relation to investigations or related disciplinary or legal proceedings. If such circumstances are found, The organization will do its utmost to inform whistleblowers that their identity is likely to be disclosed, and all reasonable steps will be taken to protect these individuals from any harm or retaliation as a result of reporting. If individuals raising issues need to participate in the investigation, the fact that they raised the issue or made the original disclosure will remain as confidential as practically possible. However, the identity of the whistleblowers may still be apparent to third parties during the investigation.

6.8.2 The Syrian Network for Human Rights recognizes that issues reported or disclosures made under this policy may involve highly sensitive and confidential matters, and whistleblowers may prefer to disclose anonymously.

6.9 Protection and Support for Whistleblowers

6.9.1 Whistleblowers who raise genuine concerns in good faith under this procedure will not be excluded or subjected to any harm or retaliation as a result of such action. Harm includes unjustified disciplinary actions and harassment.

6.9.2 Management must not retaliate against employees who report violations to their direct supervisor or through the comments hotline.

6.9.3 If whistleblowers believe they are being harmed in the workplace as a result of raising concerns under this procedure, they should immediately inform the Whistleblower Officer. Employees who retaliate or take revenge on those who have raised concerns under this policy will be subject to disciplinary procedures.

6.9.4 Those who choose to raise issues or make disclosures without following this procedure may not receive the protection outlined above.

6.10 Standards

6.10.1 The organization must ensure all employees comply with the code of conduct as outlined in the Code of Conduct Principles and Core Values in Code of Conduct (HR-010).

6.10.2 Every department manager is responsible for ensuring all employees are aware of the comments hotline and providing them with appropriate access to submit any concerns.

6.10.3 Employees must report violations as soon as they are verified to take the appropriate action in accordance with the law.

6.10.4 Employees violating the code of conduct will be subject to disciplinary procedures according to work rules and the discipline system, including dismissal as per the law.

6.10.5 Concerns or disclosures must be made in good faith and this procedure prohibits any false accusations. If there are doubts about whether the matters of concern fall within the scope of this policy (for example, if there are doubts but uncertainty about whether the law has been violated, or whether the person is acting outside their authority), such concerns should be reported to the Whistleblower Officer following the procedure outlined below.

6.10.6 If an investigation under this procedure concludes that there was a reported issue (disclosure) made maliciously, in bad faith, or for personal gain, the whistleblowers will be subject to disciplinary procedures.

6.10.7 Employees can refer their questions for clarification about the contents of the procedure to their direct supervisor, manager, or the comments hotline channel.

6.10.8 Each employee of the Syrian Network for Human Rights must fully cooperate and respond to requests made under this policy and procedure within two business days of the request date.

6.10.9 Upon joining the Syrian Network for Human Rights, each employee must commit to the principles of the Code of Conduct (HR-010) and carry out the following:

6.10.9.1. Read and fully understand the Code of Conduct and commit to its contents.

6.10.9.2. Ensure to take appropriate steps to draw the attention of all employees under their supervision to this procedure.

6.10.9.3. Comply with the policies set forth in this law.

6.10.9.4. Employees are required to sign a Compliance Certificate for the Code of Conduct and the Whistleblower Policy must be filed in their personnel files.

6.11 Procedures:

6.11.1 Whistleblowers suspecting or being aware of violations of the code should strive to substantiate these concerns with conclusive evidence.

6.11.2 Then, these whistleblowers should direct their immediate supervisor's attention (if applicable) to these violations.

6.11.3 If whistleblowers are concerned that their immediate supervisor is involved in misconduct, they should report these violations to the Human Resources representative.

6.11.4 If whistleblowers are uncomfortable reporting these violations to their direct supervisor or Human Resources representative, or if they are not employees of the Syrian Network for Human Rights, they can verbally or in writing report their concerns using the comments hotline:

A- Whistleblower Officer's email: complain@snhr.org

B- WhatsApp number: 0033970444388

6.11.4 .1 In this case, whistleblowers should state their desire to maintain the confidentiality of their identity.

6.11.5 The Whistleblower Officer will ask whistleblowers raising their concerns (or making a disclosure) to formalize their concerns in writing either before or after the initial participation. The Whistleblower Officer will acknowledge the receipt of the formal written disclosure and maintain a record of further actions taken.

6.11.6 All formally written reports should be directed to the Whistleblower Officer and should include (if possible) a clear understanding of the issue raised, realistic and not speculative details, date and time of the issue or incident or suspicion, the complainant's name and contact details, nature of the issue, time and circumstances of the claim, location of the claim, and name or names of the accused and the whistleblower (if applicable).

6.11.7 The Syrian Network for Human Rights is committed to investigating reported issues fully, fairly, promptly, and confidentially where circumstances permit.

6.11.8 Upon receiving the issue, the Whistleblower Officer will communicate with the Conduct Committee and share the information/report about the claim with the Conduct Committee.

6.11.9 The length and scope of the examination depend on the subject of the reported issue. In most cases, the Whistleblower Officer conducts an initial assessment of the reported issue to determine whether there are grounds for a detailed investigation or whether the issue (disclosure), for example, is based on incorrect information.

6.11.10 Based on the initial assessment, the Whistleblower Officer may delegate and consult the relevant department(s) within the Syrian Network for Human Rights and seek guidance from them (e.g., if the disclosure relates to a financial issue, the Whistleblower Officer should consult with finance, etc.).

6.11.11 Furthermore, if the reported issue concerns a financial and/or compliance issue and after examination and initial assessment, the Whistleblower Officer either recommends filing and closing or conducts a detailed investigation.

6.11.12 Afterward, the Whistleblower Officer, together with the Conduct Committee, will decide whether a detailed investigation is necessary.

6.11.13 If the initial assessment of the investigation findings involves senior members of the Syrian Network for Human Rights, a special committee formed by the Conduct Committee will undertake the investigation.

6.11.14 If conducting a detailed (longer) investigation is considered necessary, the Whistleblower Officer and the Conduct Committee will appoint an investigator or an investigation team including employees with expertise in workplace procedures or specialized knowledge of the subject of the reported issue.

6.11.15 In any case, a report on the reported issue will be submitted to the Conduct Committee. The Conduct Committee will inform the Board of Directors with a summary of the findings of the whistleblower case in the periodic reports submitted to the Board of Directors during the year. If there is dissatisfaction with the investigation or its outcomes, whistleblowers who raised the concern should write directly to the Chair of the Board, detailing their concerns.

6.11.16 Based on the investigation findings, disciplinary actions will be taken against any implicated individuals proven guilty. Additionally, recommendations for change will also be invited from the investigation team to enable the reduction of risks of a recurrence of any misconduct or violation disclosed. The

Conduct Committee will then be responsible for reviewing and (if appropriate) implementing these recommendations.

6.11.17 As far as the Whistleblower Officer considers it appropriate and practical, whistleblowers will be kept informed about the progress of the investigation. However, the need for confidentiality may prevent the Syrian Network for Human Rights from providing specific details about the investigation or actions taken.

6.11.18 The Syrian Network for Human Rights is committed to sending a full report to the donor describing the accident.

6.12 Review and Amendment:

6.12.1 The Whistleblower Policy reflects the practices of the Syrian Network for Human Rights. The Whistleblower Officer will be responsible for periodically reviewing this policy from an operational perspective and proposing necessary amendments and changes.