

WHISTLEBLOWING POLICY AND PROCEDURES

Purpose

- NP and its governing body, the International Governance Council, are committed to good corporate governance. This policy is intended to encourage individuals who observe any type of unsuitable behaviour to speak out without fear of retaliation.
- Employees are encouraged to raise concerns rather than overlook them due to concerns about the risk of subsequent retaliation. This enables NP to investigate possible misconduct that might otherwise go unaddressed, and take appropriate steps to deal with it.

Policy

- No board member, director, officer, or employee who in good faith reports a violation of the Code of Conduct or fraudulent behaviour shall suffer harassment, retaliation, or adverse employment consequence.

Definition

- For the purpose of this policy, whistleblowing is defined as the deliberate, voluntary disclosure of any suspected or anticipated misconduct within NP that is within its ability to control. A whistleblower is any employee who makes such a disclosure.

Applicability

- This policy applies to all employees working for NP, regardless of their position, type of employment, or location. Any employee who has observed reportable misconduct and/or action has an obligation to report it.
- This policy supplements NP's code of conduct and other policies described elsewhere in the Employee Handbook, as well as the disciplinary and grievance procedures (Section 8).

What and when to report

- Alleged wrongdoing becomes reportable when it occurs, or is likely to occur, and may either be an act, or a failure to act. Employees are encouraged to report concerns or complaints regarding conduct by managers, employees or NP Board members which they believe:
 - is a breach of, or failure to implement, or comply with, NP's governing rules, procedures, policies or established standards of practice, e.g. accounting, procurement; human resources
 - is illegal or unlawful conduct (e.g. fraud)
 - is unethical or inconsistent with the standards NP subscribes to
 - is, or results in, a waste of NP's resources or pose a risk to NP's reputation and integrity
 - represents fraud (e.g. plagiarism) or ethical violation (e.g. regarding use of data, authorship, rights)
 - are dangerous practices likely to cause physical harm or damage to a person or to property
 - is abuse of power or authority for any unauthorized or ulterior purpose
 - is unfair discrimination in the course of employment, or in the provision of services
 - represents a conflict of interest
 - is an attempt to cover up any of the above types of actions.

- Where the matters being reported relate to: (a) employee grievances over decisions regarding the employee's salary and benefits, employment status or other human resource issues affecting them; (b) discrimination, harassment and other offensive or disruptive behaviour in the workplace; and (c) interpersonal difficulties between staff and their line managers, or between employees; these are reviewed in accordance with the specific procedures established in the Employee Handbook.

Reporting channels

- The following channels are available to employees for reporting their concerns, as described in the following paragraphs:
 - Employee's immediate line manager
 - Second-level line manager
 - Head of Programme or Office
 - Deputy Executive Director
 - Executive Director
 - The Co-Chairs of the IGC

Internal channels

- Employees are encouraged to convey their concerns in writing to their immediate line manager in the first instance. If they are not comfortable doing so or if the concern relates to their line manager, or if the line manager has not acted on similar earlier complaints, employees may convey their concerns to their Programme or Office Head.
- In those instances where they are not comfortable doing so or if the concern relates to their Programme or Office Head, employees may make written reports to the Executive Director or the Deputy Executive Director, who may, in consultation with the whistleblower, decide to appoint an appropriate employee to investigate the matter reported.
- The recipient act immediately on any disclosure made under this policy. Once the disclosure is received, an initial assessment is made to determine what action should be taken. If the concern is considered to fall more properly within a different type of complaints procedure, such as a grievance or appeal, the employee is informed accordingly and provided with advice on how to proceed under this alternate procedure. Otherwise, an initial enquiry is undertaken to decide whether a formal investigation is appropriate and, if so, what form it should take. If urgent action is required, this is taken before any investigation is conducted.
- After completion of the investigation the recipient of the disclosure prepare a report which determines the existence or otherwise of misconduct, and which provides a recommendation for decision through the appropriate channels up to the Executive Director on what action is appropriate, for example imposition of disciplinary action ranging from written censure up to summary dismissal.

External channels

- The employee may make a written submission to the IGC, if he/she:
 - has grounds to believe that he/she is being subjected to retaliation by the persons he/she should report to under the established internal mechanism or
 - considers it likely that evidence relating to the misconduct be concealed or destroyed if it is reported under the internal mechanism or

- has previously reported the same information through the established internal mechanism and believes NP failed to take appropriate action within a reasonable period of time.
- The Co-Chairs of the IGC decides whether an investigation should be carried out and what form this should take, and may also recommend to the whistleblower that the case instead be reported using the established internal mechanism if, in his/her opinion, it does not meet the criteria required to utilize the established external mechanism. The Co-Chair of the IGC shall report to the full Board regarding any whistleblower report submitted to him/her.
- On the basis of the outcome of the investigation conducted, the IGC Co-Chair decide on what action is appropriate, for example disciplinary action against the wrongdoers involved, and ensure that the necessary steps to implement his/her decision are taken.
- Employees must identify themselves when reporting under the above confidential options. This facilitates the investigation of the matter being raised. It also ensures that a response can be provided.

Feedback to the whistleblower

- NP acknowledges the right of the whistleblower to receive confirmation that the matter has been properly addressed. Therefore, he/she is given as much feedback as is appropriate under the circumstances, and subject to legal constraints, is informed of the final outcome of the process.

Protection againstretaliation

- In making their reports in good faith, employees are discharging their duty to protect and serve NP. NP therefore respects and protects the confidentiality of the identity of employees who make such reports, and must ensure that there is no retaliation against them. Breaches in this regard are treated as serious violations and are subject to disciplinary provisions.
- If a situation arises where the matter cannot be resolved without revealing the whistleblower's identity, NP first discuss with him/her whether, and how best, to proceed.
- All efforts are deployed to protect the rights of the individuals who are subjects of allegations and investigations.

Actions not protected under the policy

- Where a whistleblower makes a report under this policy in good faith, reasonably believed to be true, there is no action taken against him/her should the disclosure turn out to be misguided or false. Good faith shall be deemed lacking when the whistleblower does not have personal knowledge of a factual basis for the report or where he/she knew or reasonably should have known that the report is malicious, false, or frivolous. **NP regards the making of any deliberately false or malicious allegations as misconduct, which may result in disciplinary action.**
- If a whistleblower has any personal interest in the matter he/she must make this clear at the time the alleged misconduct is reported. The act of whistle-blowing does not shield whistleblowers from the reasonable consequences flowing from any involvement in misconduct. An employee's liability for his/her own conduct is not affected by his/her disclosure of that conduct. However, in some circumstances, an admission may be a mitigating factor when considering disciplinary or other action.