

RNW Media Whistleblowing Policy

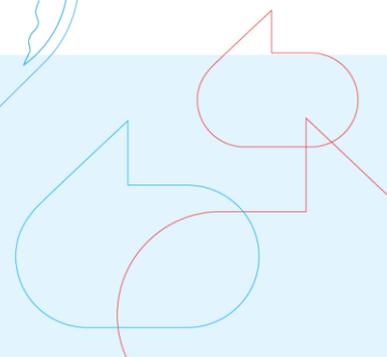
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RNW Media is committed to ensuring and maintaining the highest standards of conduct and business ethics in the delivery of our services. RNW Media promotes a strong culture of transparency and integrity in which people avoid any misconduct or irregularities. Maintaining a high ethical standard also allows for deviations from this standard to be identified and dealt with in order to prevent (further) damage.

Objectives of the Whistleblowing Policy

The objective of this policy, is to establish a uniform and effective procedure that allows for safe reporting of (suspected) misconduct or irregularities and any concern about wrongdoing without retribution. Raising malicious or unfounded allegations under this policy is prohibited, and if proven, will be considered an act of misconduct in its own right.

Misconduct, irregularities and a concern about wrongdoing

Misconduct, irregularities and concerns about wrongdoing means a suspicion from a notifier (hereafter: the whistle-blower) who works or has worked at RNW Media (in any way), as well as anyone who has or had another type of business relationship with RNW Media (e.g. suppliers, partners) and who makes a report under this policy about RNW Media or a partner's organisation. It must be based on reasonable grounds and includes (but is not limited to):

- any violation of laws and regulations;
- a breach of internal policies such as RNW Media's Code of Conduct;
- a criminal offence;
- a risk to public health, safety and/or the environment;
- the direct or indirect damage to (the name of) RNW Media in any way;

Confidentiality

At the request of the whistle-blower, RNW Media will treat the report anonymously. This means that no person involved in dealing with the report shall disclose the identity of the whistle-blower without their explicit written consent and each such person shall deal confidentially with information concerning the report.

RNW Media may however need to disclose the identity of the whistle-blower when legally obliged to do so, although no such disclosure will take place without prior discussion with the whistle-blower.

Anyone who obtains information on a report is obliged to keep it confidential, unless he or she is required under this policy, or legally obliged, to provide this information to a third party. Information on a report includes, but is not limited to, date of the report, information on the suspected misconduct, irregularities or concerns about wrongdoing, nature of event and reasons why the whistle-blower thinks/suspects there is misconduct, irregularities or a concern about wrongdoing.

No retaliation

RNW Media will take all reasonable steps to ensure that the whistle-blower does not experience any retaliation, victimisation or other negative consequences after reporting misconduct, irregularities or concerns about wrongdoing that was provided in good faith. RNW Media will treat retaliation or victimisation as a serious matter. In the event that the whistle-blower believes they are being subjected to retaliation, they can report this.

Anyone who victimises or retaliates against the whistle-blower or any other involved persons or treats the whistle-blower unfairly will be subject to disciplinary or appropriate action, including termination of Board or employee status.

The whistle-blower has the right to legal protection against negative consequences as a result of a legitimate report.

The aforementioned protection also applies if the suspicion of misconduct, irregularities or regulations cannot be substantiated following investigation.

Reporting Procedure

A culture of transparency and integrity is very important for RNW Media. Therefore, RNW Media encourages employees and business partners to discuss suspicion of misconduct, irregularities or concerns about wrongdoing first with responsible management, their supervisor, the external integrity officer, Human Resources, or any other internal party they trust. The whistle-blower may report anonymously.

If the internal whistle-blower is uncomfortable or otherwise reluctant to report to their supervisor, then they may report the concern about wrongdoing to their Management Team member, or to the Chair of the Supervisory Board. If the suspicion concerns a member of the Management Team, the internal whistle-blower may also report the suspicion directly to the external integrity officer or to the Chair of the Supervisory Board.

The whistle-blower can report the suspicion of misconduct, irregularities or concern about wrongdoing in writing (HR@rnw.org) or verbally. If reporting is done verbally, the person to whom the internal report is made will put it in writing and provide this document to the whistle-blower for their consent and signature.

The whistle-blower may consult an advisor in confidence regarding the concern about wrongdoing to be provided with advice on the best course of action before filing a report. The external Integrity Officer can be the advisor in these cases. The whistle-blower can also choose to ask advice from other sources such as a lawyer, the Advice Centre for whistle-blowers or the Labour Union. RNW Media will not compensate any costs incurred for this advice.

Handling the report

The reported information will be evaluated and verified to the fullest extent possible. Within five business days of the initial report, the whistle-blower shall receive a reply regarding the next steps in the procedure. If the report is investigated this will be communicated to the whistle-blower including the next date the whistle-blower will receive an update or outcome. If the report is not investigated this will be communicated to the whistle-blower including the motivation as to why an investigation will not be performed.

Supervisors, managers and/or board members who receive the report must promptly act to adequately investigate and/or resolve the issue and remedy its damaging consequences or decide that no investigation will take place and motivate this so as to comply with this policy.

If the investigation of a report that was made in good faith and investigated by internal personnel is not to the whistle-blowers' satisfaction, then they have the right to report the event externally to the external Integrity Officer or the Investigation department of the Whistle-blowers Authority or another appropriate legal or investigative agency, such as the police or the Public Prosecution Service.

Please note that an external report is only permitted if the whistle-blower reported the concern about wrongdoing internally first. If the whistle-blower cannot reasonably be expected to report internally first and has a well-founded reason for this, for instance if colleague(s) is/are in acute danger, the whistle-blower may report externally without reporting internally first.

In the case an external report is made, the whistle-blower will always have to weigh the public interest in reporting the concern about wrongdoing externally against RNW Media's interest in keeping the concern about wrongdoing confidential.