



Fairtrade Finland

Whistleblower Protection Policy

Administration

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A. Objectives

Fairtrade Finland is committed to maintaining an open organizational workplace, including places where Fairtrade Finland work is done with the highest standards of integrity, respect, dignity, honesty and accountability, where any legitimate concerns can be reported with confidence and safety. Fairtrade Finland requires board members, managers, employees, volunteers, consultants, contractors, associates and partners to observe high standards of operation and ethics in the conduct of their duties and responsibilities. As representatives of Fairtrade Finland, we must practice integrity in fulfilling our responsibilities and comply with all applicable Fairtrade Finland policies, laws and regulations.

This policy is intended to

- provide a safe environment through which you can voice a concern or make an allegation in good faith without fear of reprisal or unfair treatment and
- encourage persons associated with Fairtrade Finland's work to report suspected or actual occurrence(s) of illegal, unethical, safeguarding breaches or inappropriate events (conduct or practices) through fair, protective and easily accessible procedures without retribution or threat of retribution.

Fairtrade Finland attaches great importance to identifying and remedying breaches in its Code of Conduct ("Fairtrade Organization Code") or other wrongdoings. Fairtrade Finland therefore actively promotes "whistleblowing", which means we encourage you to safely come forward, speak up, speak out and raise in good faith concerns of possible misconduct, fraud, corruption, harassment, abuse of authority, discrimination or other wrongdoings. We support a safe and open environment where such good faith reporting is viewed as a positive action – because you are protecting the best interests of the organization and securing its credibility as an ethical and fair employer.

B. Scope

This policy applies to all the people we work with and who work for Fairtrade Finland, including:

- Board members and Board Committee members
- Executive Director and Employees of Fairtrade Finland ("staff members")
- Consultants and associates, Individual Contractors
- Volunteers
- Interns and Student Assistants
- Implementing partners, donors and responsible parties engaged/contracted by Fairtrade Finland for a project or activities ("implementing partners" and "responsible parties", respectively)



and to any behavior relating to work or in the context of work. It is expected that all individuals familiarize themselves with this Policy, which is available on the Fairtrade Finland intranet and website.

C. Definitions

1. Whistleblower

A person, who reports (suspected or actual) wrongdoing, including suspicion of misconduct, fraud, corruption, misuse of resources, neglect of duties, abuse, harassment, other safeguarding breaches or a risk to health and safety.

2. Misconduct

Actions or activities that go against our values or interests of Fairtrade Finland or of the public, including:

- Abuse of authority or unequal power relations
- Violation of the law/regulations
- Breach of contract
- Negligence causing substantial and specific danger to public health and safety
- Manipulation of company data/records
- Financial irregularities, including payment or receipt of a bribe, fraud or suspected fraud or deficiencies in internal control and check or deliberate error in preparations of financial statements or misrepresentation of financial reports
- Any unlawful act whether criminal/ civil
- Disclosure of confidential/propriety information
- Misappropriation of company funds/assets
- Bribery or corruption
- Sexual harassment, exploitation or abuse
- Bullying
- Racist, homo-trans-phobic, sexist or other forms of discrimination
- Use of the forced child labour and forced adult labour, including bonded labour and trafficked labour
- Retaliation
- Breach of IT security and data privacy
- Social media misuse
- Damage to the environment
- Breach of Fairtrade Finland Policies or failure to implement or comply with any approved Fairtrade Finland Policy



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- other unethical conduct or breaches in the Code of conduct.

D. Policy Statement

1. The Whistleblower should promptly report verbally or in writing suspected or actual events to his/her supervisor or the Occupational Safety and Health Manager. If the Whistleblower would be uncomfortable or otherwise reluctant to report to his/her supervisor, then the Whistleblower may report the allegation or event to the next highest or another level of management, including to the Board Chair.
2. The Whistleblower can report the event with his/her identity or anonymously. However, Whistleblowers are encouraged to put their name to the allegation whenever possible. Otherwise, it will be difficult to protect the Whistleblower and give feedback.

Whistleblowing shall not serve for general complaints, for instance for cases of general discontent, questions regarding operational procedures, processes etc., questions regarding the validity or interpretation of specific compliance guidelines or rules of procedure, staff job performance matters or interpersonal conflicts.

3. The Whistleblower shall receive no retaliation or retribution for a report that is provided in good faith – that was not done primarily with malice to damage another person or the organization.
4. A Whistleblower who makes a report that is not done in good faith is subject to discipline, including legal means to protect the credibility of the organization and members of its Board and staff.
5. Anyone who retaliates against the Whistleblower (who reported an event in good faith) will be subject to discipline.
6. Crimes against persons or property, such as assault, rape, burglary, etc., shall immediately be reported to local law enforcement personnel or other relevant agencies where appropriate and applicable.
7. Supervisors, managers, Board members or any other persons who receive the reports must promptly and safely act to support an investigation by skilled personnel of the organization and/or resolve the issue.
8. If the investigation of a report, that was done in good faith and investigated by internal personnel, is not to the Whistleblower's satisfaction, then he/she has the right to report the event to the appropriate legal or investigative agency.



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9. The identity of the Whistleblower, if known, shall remain confidential to those persons directly involved in applying this policy, unless the issue requires investigation by a law enforcement agency.
10. Both the reporting and receiving parties of information must do no harm to ensure the investigation does not bring further harm to the alleged subject/s of an allegation or event, including the alleged offender who has a right to procedural fairness

E. Reporting a Suspicion

1. to Supervisors, Occupational Safety and Health Manager/CEO/Board Chair

Any person who, in the course of or in connection with their duties, discovers that serious irregularities or misconduct may have occurred or may be occurring, are obliged to report this discovery forthwith and to their immediate supervisor or next in-line supervisor or higher. Supervisors are urged to create and enable a culture of open and safe communication and to listen actively to concerns – also in terms of handling applicable rules or doubtful situations. Supervisors are obligated to prevent discrimination against or threats to their staff or any person acting on behalf of the organization or associated to Fairtrade Finland's work.

Alternatively, you may also report directly to the Occupational Safety and Health Manager/CEO/ Board Chair, particularly if there is a concern that disclosure may lead to retaliation or that the intended recipient of the report is personally implicated in the serious irregularities or misconduct, or you are not satisfied with the supervisor's response.

2. External reporting – Statutory Authorities

You may also bypass the internal reporting system and report directly to the respective authorities while the protection to the Whistleblower still applies.

Any such report should where possible be in writing and should contain, as appropriate, details of:

- the nature and facts of the alleged breach or misconduct
- the person or persons allegedly responsible for the breach
- the nature and whereabouts of any further evidence that would substantiate the complainant's allegations, if known.

F. Compliant and Allegation Handling



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1. The recipient of the disclosure must ensure that concerns raised are taken seriously. The recipient of the disclosure must escalate the case to Occupational Safety and Health Manager / CEO of Fairtrade Finland for further investigation and due and fair process.
2. Occupational Safety and Health Manager / CEO can then formulate a case committee with skilled and experienced persons and appoint a lead and neutral investigator for investigation. All potential or actual conflict of interest issues would be weighted and removed before engaging in the investigation.
3. The case committee shall bring all relevant stakeholders together, to determine whether the suspicion or allegation reported is one that should be investigated or not, and whether it needs to be reported to any statutory authorities (local or international) based on legal guidance and risk to the Whistleblower. If it is decided to proceed with an investigation, the suspicion becomes known as an allegation of misconduct or wrongdoing. An investigation plan will then be formulated by the case committee to ensure all relevant questions are addressed, the scale of the investigation is in proportion to the seriousness of the allegation(s) and sufficient resources are allocated.
4. Strict confidentiality will be maintained during the investigative process. All information obtained will be properly secured to prevent unauthorized access. All relevant witnesses or involved parties will be interviewed including the subject of allegation (whom will be interviewed at last) and related documents examined. Contemporaneous notes of all discussions, phone calls and interviews will be made.
5. If an allegation is made in good faith and reasonably believing it to be true, but it is not confirmed by the investigation, the management will recognize the Whistleblower's concern and he/she has nothing to fear. If however, the Whistleblower made an allegation frivolously, to sabotage another person's work or position whether intended or not, maliciously or for personal or professional gain, appropriate action that could include disciplinary action, including dismissal for serious or repeated offences.

G. Data Protection and Confidentiality

1. All reported information regardless if these are true or not, are likely to severely damage the reputation of the subject, the Whistleblower and / or third parties as well as the organization. Therefore, all information will be treated with a level of high confidentiality.
2. Any access of persons to reports and related data as well as their roles and responsibilities for accessing these data will be recorded in the data registry. These persons shall be obliged to maintain all internal and legal regulations on confidentiality.



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3. Any IT solutions for the receiving reports and processing of indications must be reviewed and approved by the CFO and Finance and Administration Manager.

H. Document History

Document version	Date approved and by whom	Mandatory Review	Creator
1.1	10.11.2021, Fairtrade Finland Board	Fairtrade Finland Board approves all changes.	Administration