

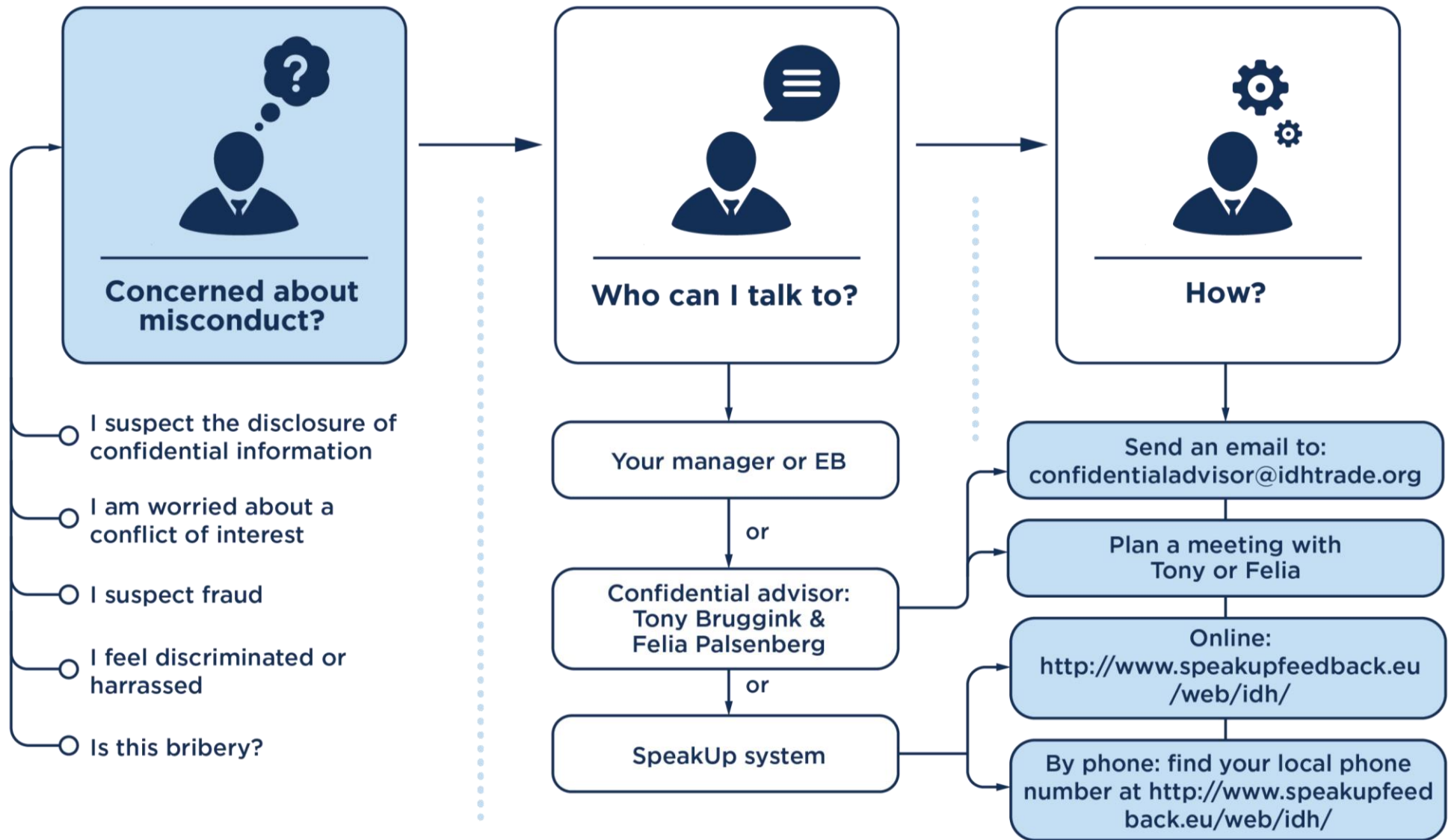
# 2020

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## SpeakUp policy

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# 1. When should I speak up?

## 1.1 Why is speaking up important?

IDH prioritizes an open and transparent culture where everyone feels safe. Speaking up is very important and the right thing to do. When you suspect a violation of IDH's values, the principles set out in the Code of Conduct<sup>1</sup>, other IDH policies or laws or regulations has occurred or may occur ("Misconduct"), it is important to report this. We recognize it may not be easy to report Misconduct, however, when we know of a (potential) issue, we can address it and can probably mitigate (some of the) consequences. Anyone reporting in good faith will be protected against reprisals and negative consequences after reporting a concern. This SpeakUp policy describes how you can report any suspected Misconduct and what happens after you made such report. IDH offers its reporting mechanisms internally to our staff and to anyone else outside the organization that becomes aware of (potential) Misconduct related to IDH.

## 1.2 What is the purpose of the SpeakUp policy?

This SpeakUp policy describes how you can raise concerns about suspected Misconduct. It also describes what happens after you raised a concern and what you can expect from IDH.

## 1.3 Who can speak up?

The SpeakUp policy is for all persons with an employment contract, internship contract or a service agreement with IDH. Furthermore, the SpeakUp policy is available for any third party that wishes to raise a concern about possible Misconduct within IDH or related to IDH's activities, such as implementing partners, consultants and individuals and communities affected by our work.

## 1.4 What concerns are covered by the SpeakUp policy?

Anyone with knowledge of suspected misconduct is obliged to report all suspicions of misconduct in violation of IDH's values, the principles set out in the Code of Conduct, other IDH policies and all violations of laws or regulations.

Examples of concerns that can be raised using this Speak Up policy are (this is not an exhaustive list):

- Human rights violations
- Threats or acts of violence
- Fraud
- Conflicts of interest

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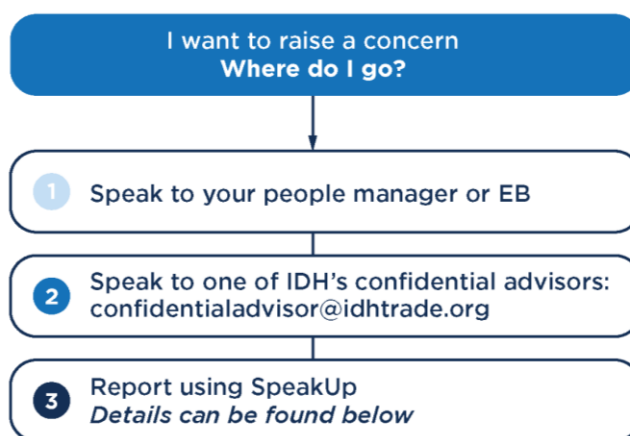
<sup>1</sup> The IDH Code of Conduct can be found [here](#).

- Bribery or corruption
- Any behavior that restricts competition
- Discrimination
- Sexual harassment, abuse or exploitation
- Bullying
- Disclosure of confidential information
- Improper use of company resources or donor funding
- Environmental, health and safety issues
- Violation of any if our (other) policies
- Violation of any applicable law or regulation

# 2. How do you speak up?

## 2.1 Speaking up internally

Our SpeakUp policy allows you to raise your concerns about suspected Misconduct through a variety of ways. If you are not comfortable with using one of the reporting possibilities, for example because that person is involved in the Misconduct, you are encouraged to use one of the other possibilities. The reporting possibilities are as follows:



### SPEAK TO YOUR MANAGER OR THE EXECUTIVE BOARD

IDH adheres to an open-door policy in which you should always feel free to reach out to your people manager to discuss anything you have on their mind, as well as raise any concerns you have. If you are not comfortable reporting to your people manager, for example because the issue concerns your manager, you are encouraged to speak to IDH's Executive Board.

### SPEAK TO ONE OF IDH'S CONFIDENTIAL ADVISORS

When one of our people feels uncomfortable to reach out to their people manager or EB, there is the possibility to discuss the issue with the confidential advisor. The confidential advisor will listen and help to find a solution to the issue where possible. The confidential advisor will treat all information provided to him or her as confidential and will not share this unless specifically requested to do so by you. The confidential advisor is a generally trusted person whose role as confidential advisor is made known to all our people. He or she can easily report directly to the Executive Board, is well embedded in the daily operations of IDH and has an exemplary position regarding compliance with the Code of Conduct.

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#### IDH'S CONFIDENTIAL ADVISORS ARE:

Felia Palsenberg:	<a href="mailto:Palsenberg@idhtrade.org">Palsenberg@idhtrade.org</a>
Tony Bruggink:	<a href="mailto:Bruggink@idhtrade.org">Bruggink@idhtrade.org</a>
Both confidential advisors:	<a href="mailto:confidentialadvisor@idhtrade.org">confidentialadvisor@idhtrade.org</a>

## REPORT USING IDH'S SPEAKUP SYSTEM

If you are not comfortable with the above reporting possibilities or prefer to remain anonymous, you can use our external SpeakUp system to raise your concern confidentially and in your own language. The SpeakUp system is ran by an independent third party and is available 24/7/365. There are two ways to submit a report through the SpeakUp system:



**ONLINE** To report Misconduct online, please visit IDH's SpeakUp system at: <http://www.speakupfeedback.eu/web/idh/> where you can fill in a form to submit your concern.



**BY PHONE** To report Misconduct by phone, please call the SpeakUp line in your country (free of charge). Please go to: <http://www.speakupfeedback.eu/web/idh/> to find your local phone number.

**Note:** If your country is not listed in the SpeakUp system, please select the Netherlands to file a report of your concern online. If you would like to learn more about how to report using the SpeakUp system or how the SpeakUp system works, please refer to the Frequently Asked Questions about the SpeakUp system document, to be found here.

## 2.2 Speaking up externally

IDH strongly encourages you to raise concerns internally through one of the above possibilities. By speaking up internally, you give IDH the chance to look into the matter and take action if needed. In this way, we can improve IDH together. However, if you feel it cannot reasonably be requested to notify your buddy, manager, EB, confidential advisor or report using the SpeakUp system, you can also notify an external party. This can be done when this follows from a statutory regulation or in the event of:

- an acute danger, where a serious and urgent social interest creates the necessity for an external notification
- a reasonable suspicion that the Executive Board is involved in the misconduct
- a situation in which you can reasonably fear the actions that would result from your internal notification
- a clear identifiable treat of embezzlement or destroying of the evidence
- an obligation of direct external notification
- a previous report following the internal procedure of the same misconduct did not lead to improvement of the situation of Misconduct.

You can file an external report with the external organization that on reasonable grounds is most suitable to process the report. This could be:

- an organization that is charged with the investigation of criminal acts
- an organization that is charged with supervising the compliance with the provisions under or pursuant to any statutory regulation
- another authorized organization where the (suspected) Misconduct can be reported, such as the Advice department of the house for Whistle blowers. The advice department can be consulted to verify which steps can be taken and which protection is offered by the law. Please visit <https://www.adviespuntklokkenluiders.nl> or <https://huisvoorklokkenluiders.nl/> for more information or send an e-mail to [advies@huisvoorklokkenluiders.nl](mailto:advies@huisvoorklokkenluiders.nl).
- If you believe on reasonable grounds that the social interest supersedes the interest of IDH in confidential treatment of the report, you can file an external notification at the external organization that (based on reasonable grounds) can be deemed capable to eliminate or have the misconduct eliminated.



# 3.

## What happens after you speak up?

### 3.1 What happens after you reported to your manager, the Executive Board or confidential advisor?

When you raised your concern with your manager, the Executive Board or one of IDH's confidential advisors, they will discuss possible next steps with you, for example if you want your manager to talk to the person concerned or that an investigation must be started. If you raised the concern with your manager, your manager will always confidentially inform the confidential advisors of your concern. This is necessary for IDH to have insight in whether the reporting mechanisms are functioning effectively and to learn from issues raised. If you wish, you can ask your manager to inform the confidential advisors anonymously.

When the concern you raised is of serious nature and warrants an investigation, your buddy, manager or the confidential advisor will draft a written record of your notification and will share the written record with you for approval and signing. You will also receive a copy. Your buddy, manager or the confidential advisor will forward the notification to Executive Board. When there are reasonable grounds to suspect that the Executive Board is involved with the misconduct, the chair of the Supervisory Board will be informed instead. In that situation, all reference to the Executive Board in this policy should be read as Supervisory Board.

The Executive Board will send you a receipt of the notification and appoints a contact person with the objective to prevent discrimination because you raised a concern.

The Executive Board will set up an investigation committee composed by the most appropriate person to investigate the reported Misconduct, unless:

- a. There is insufficient information for an adequate investigation and if there is no possibility of obtaining further information.
- b. It is established that the report was made in bad faith.
- c. It is obvious that the notification does not relate to Misconduct that is serious enough to warrant an investigation.

Please refer to paragraph 3.3 to find out more about the process of an investigation.

### 3.2 What happens after you reported using IDH's SpeakUp system?

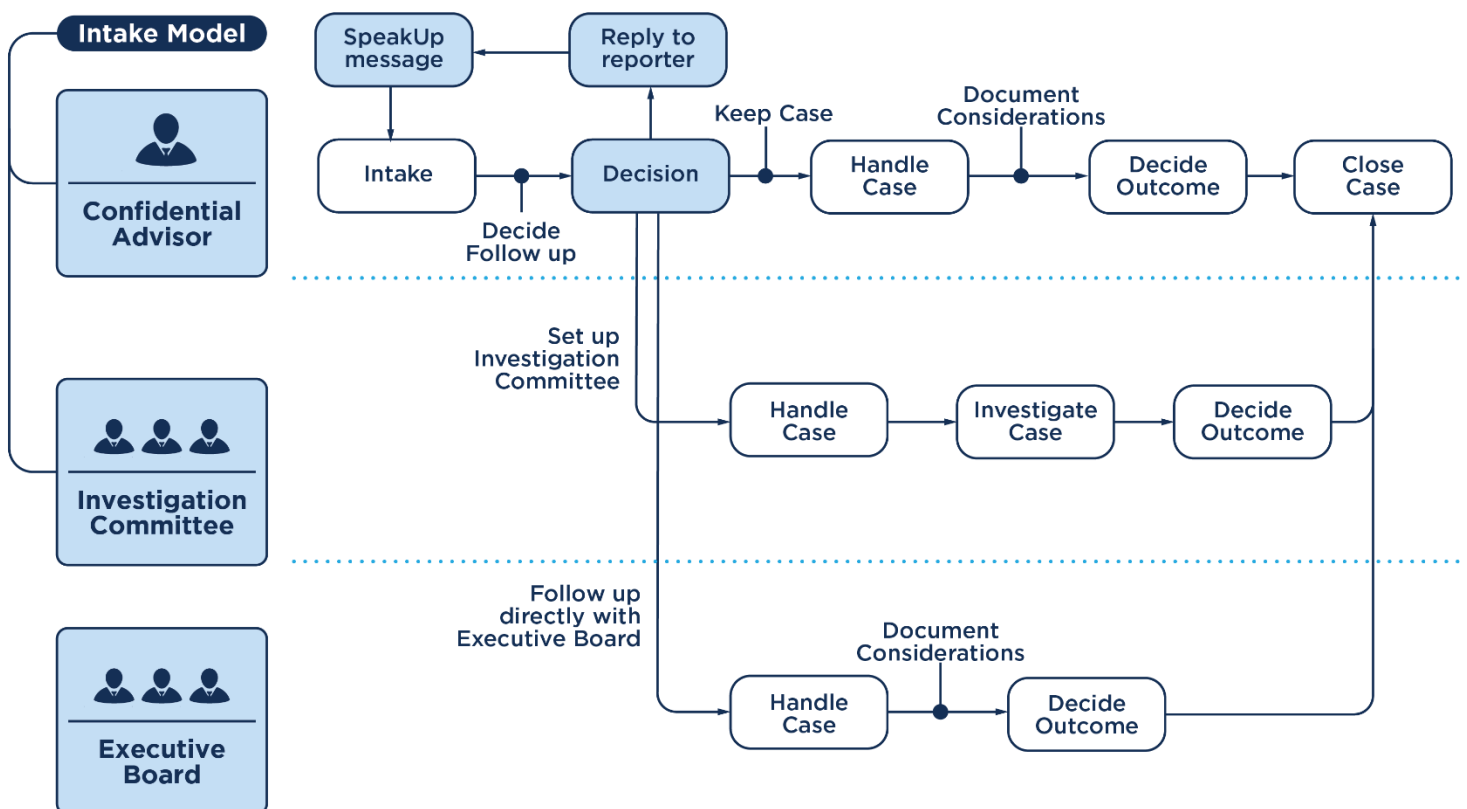
After you filed your report by phone or online using IDH's SpeakUp system, you will receive a personal case number. It is very important to write down this case number. You can use it to call back or access the website to check

whether a response from IDH was left for you. If you choose to remain anonymous, it is particularly important to keep your personal case number, because in that case IDH can only contact you through the website.

All reports received via the SpeakUp system go to the IDH Confidential advisors, who will evaluate and assess the information received, and determine the appropriate course of action. The confidential advisor can reply to you with feedback on your report or with further questions. In that case, you can provide additional information. The confidential advisor can decide to handle the case themselves and decide on the outcome. You will receive a confirmation of receipt within one week, with an estimate how long it will take to handle and assess your concern.

When the concern you raised is of serious nature and warrants an investigation, the confidential advisor will refer the case to an investigation committee that will be especially composed of the most appropriate persons for the specific case at hand. The investigation committee will investigate the case. Please refer to paragraph 3.3 to find out more about the process of an investigation. After the investigation, the investigation committee will decide on the outcome (for more information, please refer to paragraph 3.4).

When the concern you raised does not warrant an investigation, but is of such nature that handling by the confidential advisor would not be appropriate, it will be referred to the Executive Board. The Executive Board will handle the case and decide on the outcome.



### **3.3 When an investigation is started**

If it is decided by the Executive Board or the confidential advisor that an investigation is warranted, they will inform you of their decision in writing within one week. They will inform you that an investigation is conducted, explain their consideration with regards to their decision and who is conducting the investigation.

The Executive Board or confidential advisor will ask independent and objective persons within IDH to conduct the investigation. This will be persons that are most appropriate based on the specifics of the case at hand. Under no circumstances the investigation will be conducted by persons that are involved in the possible misconduct or irregularity. The investigations committee will inform all people involved about the notification and the investigation that is conducted, unless the interest of the investigation could be harmed by this information or there is a substantial risk of destruction of evidence.

The investigation committee will interview you and other people involved (anonymously if so requested). The investigation committee will document such interviews appropriately and share the report with the interviewee for their approval and signing. The investigation committee can also review all relevant documents for their investigation. Everyone is obliged to co-operate fully with and assist with such investigations.

After completion of the investigation, the investigation committee will share the draft investigation report with you and give you the opportunity to provide input and comments, unless there are serious objection against this. Subsequently the investigation committee finalizes the investigation report and sends a copy of the final report to you, unless there are serious objections against this.

Review and investigation are conducted in an independent, fair and unbiased manner with respect to all parties involved and in accordance with relevant laws and principles (including fair hearing). Details of the case, your identity and the identity of anyone else mentioned in the report, are kept confidential throughout and after the investigation and are only shared on a need-to-know basis.

Anyone involved in an investigation must cooperate and answer all questions completely and honestly. Lying to the people performing the investigation as well as delaying, interfering with or refusing to cooperate with an investigation may lead to disciplinary measures. All parties involved, including the accused, are entitled to confidentiality in order to avoid unnecessary damage to their reputation. Therefore, if you participate in or learn about an investigation, you must keep the matter confidential.

### **3.4 Appropriate measures**

If your concern is well-founded (i.e. Misconduct has indeed taken place), appropriate measures will be taken where necessary in accordance with the law, our Code of Conduct and terms of employment. IDH will inform you within eight weeks after you raised your concern the position of the organization regarding the suspicion of the Misconduct. If the Executive Board cannot inform you in time, they will inform you of this delay in writing. In this writing they will state in what due course you can expect to receive the IDH's opinion. The term for informing you can be extended with a maximum of four weeks. You will be given the opportunity to respond to the position of IDH.

After the investigation has been finalized the Executive Board will decide if an external organization should be informed. If the Executive Board decides to inform an external organization, they will notify you, unless there are serious objections against notifying you.

### **3.5 What to do if you have a concern about the follow-up on a report?**

If you believe that your concern or a concern raised against you has not been dealt with appropriately, that an investigation was not performed correctly, if you have not been informed by the Executive Board about the position of the organization within the term as referred to in paragraph 3.4 or if the investigation report or the position of IDH reflect material inaccuracies, you can indicate this to the Executive Board or the Supervisory Board if the issue is with the Executive Board. The Executive Board will reply to this and can issue a new or additional investigation if necessary. The process described above in paragraphs 3.1, 3.13.2 and 3.3 will apply to this additional investigation. You can also report your concerns about the abovementioned situations externally as described in paragraph 2.2.

# 4. Protection of your position

## 4.1 Do reports remain confidential?

All reporting remains confidential. This means that information about your concern will only be shared with a limited number of people and on a strict need-to-know basis. The third party that hosts the SpeakUp system will never disclose voice-file, IP addresses or phone numbers, unless one of the two situations below apply. In these situations, voice file, IP addresses phone might be handed over to the authorities, but never to IDH:

- a. In cases where it is established that a report has been made in bad faith
- b. If the report itself is a criminal offence (e.g. a serious threat)

IDH will only disclose information if we are required to do so by law or an important public interest is at stake. We are however obliged to inform the implicated person that a complaint has been filed against them, but your identity will not be disclosed. The implicated person will not be informed when there is a substantial risk of destruction of evidence or impediment to the investigation. Please remember that you should also keep the matter confidential and not discuss your report with colleagues or anyone else.

## 4.2 Is it possible to report anonymously?

You can share your concerns anonymously. The SpeakUp system is the best way to do so. However, you are encouraged to not report anonymously, as it is more difficult or even impossible for us to investigate reports that are made anonymously.

## 4.3 How will you be protected when you speak up?

In IDH, we believe speaking up is very important and the right thing to do. IDH prioritizes an open and transparent culture where everyone feels safe. Please feel confident that you will not face reprisals or negative consequences for reporting a concern or allegation in good faith about suspected Misconduct. Any form of threat or retaliation will not be tolerated. Retaliation against reporters may lead to disciplinary measures.

You will not be protected if you maliciously raise a concern that you know is false. Reporting in bad faith is considered a breach of the Code of Conduct and may lead to disciplinary measures.

Review and investigation are conducted in an independent, fair and unbiased manner with respect to all parties involved and in accordance with relevant laws and principles (including fair hearing).

#### **4.4 What should you do if you notice any retaliation?**

IDH prioritizes an open and transparent culture where everyone feels safe. Retaliation against persons who speak up is taken very seriously. If you notice any retaliation or punishment against you or anyone else for raising a concern in good faith, please report this via the reporting channels described above in paragraph 2.1. A report on retaliation will follow the same procedure as other reports.

# 5. Protection of the accused

## 5.1 What happens when you are accused of Misconduct?

When you are officially under investigation, or if you are otherwise included in a report, you will be notified about this fact. IDH will inform you as soon as possible and in any event within three days. IDH may not notify you or the period within IDH will notify you can be extended if there is a substantial risk of destruction of evidence or impediment to the investigation.

## 5.2 How will you be protected when you are accused?

All parties involved, including the accused, are entitled to confidentiality in order to avoid unnecessary damage to their reputation. For more information on confidentiality, please refer to paragraph 4.1. Review and investigation are conducted in an independent, fair and unbiased manner with respect to all parties involved and in accordance with relevant laws and principles (including fair hearing).

## 5.3 What happens when the accusation is well-founded (i.e. Misconduct has indeed taken place)?

When the investigation shows you were involved in Misconduct, appropriate measures will be taken where necessary in accordance with the law, our Code of Conduct and terms of employment.

## 5.4 What to do if you have a concern about the follow-up on a concern?

Please refer to paragraph 3.5 to find out what you can do if you believe that a concern raised against you has not been dealt with appropriately, that an investigation was not performed correctly or if you have any other concerns about the follow-up of a concern raised against you.

## 6. Data protection & privacy

### 6.1 How will your privacy be safeguarded?

IDH is committed to protecting the privacy of everyone involved. The SpeakUp policy relies on the processing of personal data, therefore, data protection laws are applicable. IDH complies with the applicable laws. Any personal data obtained as part of this SpeakUp policy will only be used for the purposes explained in this policy, for IDH's legitimate interests to ensure compliance with IDH's policies and procedures, for IDH to comply with the law or important public interest and of detecting misconduct that otherwise would not be detected. Please find out more details on the protection of personal data in the IDH Privacy Statement for employees and associates, to be found [here](#), or the IDH Privacy Statement for suppliers and business partners, to be [found here](#) or on IDH's website via the 'Our Policies' tab on the 'About' webpage: <https://www.idhsustainabletrade.com/about-idh/>.

## 7. More information?

If you have questions relating to this SpeakUp policy or if you need assistance, please contact:

- Your legal counsel
- The confidential advisors: [confidentialadvisor@idhtrade.org](mailto:confidentialadvisor@idhtrade.org)