

# **NEPCon Whistleblower Policy**



NEPCon Policy April 2018



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Contact email:	jp@nepcon.org



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#### 1 Introduction

NEPCon requires its directors, employees, board members, volunteers, consultants and other representatives to observe high standards of professional and personal ethics in the conduct of their duties and responsibilities. Employees and representatives of NEPCon must practice honesty and integrity in fulfilling responsibilities and comply with all applicable laws and regulations, as well as NEPCon's Anti-Corruption Policy, Impartiality Policy and Confidentiality Policy.

# 2 Reporting Responsibility

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally, so that NEPCon can address and correct inappropriate conduct and actions. It is the responsibility of all directors, employees, board members, volunteers, consultants and representatives to report concerns about violations of NEPCon rules and policies, unethical behaviour, or suspected violations of laws or regulations that govern NEPCon's operations.

# 3 Reporting Procedure

Directors, employees, board members, volunteers, consultants or other NEPCon representatives may submit complaints or concerns about suspected ethical and legal violations orally or in writing to NEPCon's Director of Support and Compliance, who has the responsibility to investigate all reported complaints. If they are not comfortable doing this, or if a complaint concerns the Director of Support and Compliance, the individual should submit the complaint to the Executive Director. A complaint can also be submitted to the Chair of the Board.

# 4 Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

# 5 Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false may be subject to disciplinary action, up to and including termination of employment.



#### 6 No Retaliation

It is contrary to the values of NEPCon for anyone to retaliate against any director, employee, board member, volunteer, consultant or other NEPCon representative who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of NEPCon. No-one who in good faith reports any action or suspected action that he or she perceives to be illegal, fraudulent, or in violation of any NEPCon operations shall suffer intimidation, harassment, discrimination or other retaliation or, in the case of employees, adverse employment consequences. NEPCon will impose disciplinary measures, up to and including termination of employment, against anyone who threatens or retaliates against a person for reporting a violation in good faith.

# 7 Handling of Reported Violations

NEPCon's Director of Support and Compliance is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Director of Support and Compliance will acknowledge receipt of the reported violation or suspected violation to the person who submitted the complaint. All reports will be promptly investigated, including an evaluation of scale and scope, and appropriate corrective action will be taken if warranted by the investigation. The Director of Support and Compliance will inform the Executive Director of all complaints and their resolution, and report at least annually to the Board on complaints and their resolution.

Policy approved by Executive Director, Peter Feilberg on 3 April 2018.



# **About NEPCon**

NEPCon (Nature Economy and People Connected) is an international non-profit organisation that works to build capacity and commitment for mainstreaming sustainability. For over 20 years, we have worked to foster sustainable land use and responsible trade in forest commodities. We do this through innovation projects, capacity building and sustainability services.

We are accredited certifiers for sustainability schemes such as FSC<sup>TM</sup>, PEFC, RSPO and SBP. We offer Chain of Custody certification according to the Rainforest Alliance Sustainable Agriculture Standard. We also certify to our own LegalSource<sup>TM</sup> Standard and Carbon Footprint Management standards. A self-managing division of NEPCon promotes and delivers our certification services. Surplus from certification activities supports the NEPCon's non-profit activities.

NEPCon is recognised by the EU as a Monitoring Organisation under the EU Timber Regulation.

# **Contact**

#### **NEPCon**

Skindergade 23, 3. I DK-1159 Copenhagen I Denmark

Tel.: +45 8618 0866 | CVR: 18044633 www.nepcon.org | info@nepcon.org



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