

SNV Whistleblower Procedure 2011

The SNV whistleblower procedure is a set of measures that allow people within SNV to report alleged irregularities for investigation confidentially and without fear of prejudice, while providing clear steps and measures to resolve the issue.

Why blow the whistle?

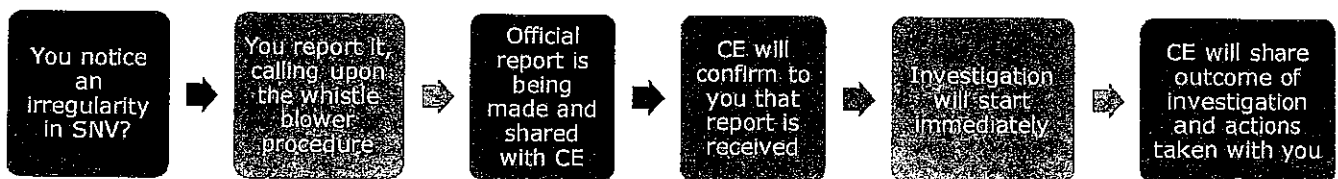
You can 'blow the whistle' to initiate an investigation into any illegal or unethical operational or financial practices you believe have taken or are taking place within SNV.

How do I blow the whistle?

Blowing the whistle is as simple as reporting the suspected irregularity to your manager – verbally, or in writing.

The basic steps of the procedure are as follows:

- 1) You report the suspected irregularity to your manager, another person in charge (i.e., your Country Director or regional manager), or the external confidentiality counsellor (Mr Henk Muller or Mr Wim Veldman), indicating that you are calling upon the SNV Whistleblower Procedure.
- 2) The person to whom you make the report will make a written record of the report, with date of receipt, which you will be asked to approve and co-sign.
- 3) The Chief Executive of SNV will receive a copy of the record and confirm to you that he/she has been notified and received the report.
- 4) An investigation into the irregularity will be launched immediately.
- 5) Within eight weeks, you will be informed in writing by the Chief Executive on the status of the investigation and actions taken to resolve the issue.



Remember, reporting is 100% confidential

The information you provide, including your **identity**, and the identity of the individual to whom the irregularity was reported, **will remain secret**. No information will be provided to internal or external parties without the consent of the Chief Executive.

Making a report is within your rights and will in no way affect your treatment or position within SNV.

For an expanded version of this guide, or the official text of the procedure please visit [include link]

Whistleblower procedure

Reporting Procedure in case of (alleged) impropriety

This document sets out SNV's procedure for dealing with alleged irregularities; it is intended for all SNV employees.

For incidents related to harassment or discrimination, a specific Harassment reporting procedure is in place.

Section 1 – Definitions

Article 1

In this procedure, the following terms shall have the following meanings:

- The employee: an individual employed by the Stichting (Foundation) and its international regional and country offices;
- The Foundation: SNV Netherlands Development Organisation;
- The Chief Executive: The Chief Executive (CE) of SNV Netherlands Development Organization;
- the Chairman of the Supervisory Board: the chairman of the Supervisory Board of SNV;
- Manager: the person directly managing the employee;
- Confidential counsellor: one or more persons appointed by the CE to act in that capacity for the SNV;
- Alleged impropriety: a suspicion of irregularities, of a general, operational and financial nature and based on reasonable grounds, with regard to the SNV (worldwide), whereby a societal interest is or will be at stake and lies within the employer's sphere of influence, and in connection with:
 - a. an (imminent) criminal offence;
 - b. an (imminent) violation of laws and regulations;
 - c. an (imminent) intentional provision of incorrect information to public bodies;
 - d. a danger to public health, security or the environment;
 - e. a violation of rules of conduct applicable within the organisation;
 - f. an imminent wastage of public monies, or;
 - g. (an imminent) intentional suppression, destruction or manipulation of information regarding those facts or other facts that could be injurious to SNV.

Section 2 – Procedure

Article 2

1. Unless a ground for exemption applies, as specified in article 5 clause 2, the employee should report alleged irregularities internally to his/her manager or, if the employee considers reporting to his/her own manager is inappropriate, they may instead report to a person in charge or, if the employee considers reporting to a person in charge is inappropriate, he/she may instead report his/her concern to a confidential counsellor. The employee may also choose to report any alleged irregularity to the confidential counsellor in addition to the manager and person in charge.
2. The manager, the person in charge or the confidential counsellor shall make a written record of the report and of the date of its receipt and shall have the employee concerned sign the record for approval. The employee shall receive a copy of the record. The manager, the person in charge or the confidential counsellor shall immediately ensure that the Chief Executive is notified of the alleged irregularity and of the date of receipt of the report. He or she shall ensure that the CE receives a copy of the record.
3. The CE shall send a confirmation of receipt to the employee who reported the alleged irregularity. The confirmation shall refer to the original report. This also applies to cases in which the employee reported the alleged irregularity to the confidential counsellor rather than to his manager or to the person in charge.
4. Immediately after the employee's report, an investigation shall be started by the manager, other person in charge or the confidential counsellor (depending on who the employee reported to) into the alleged irregularity.
5. In providing information, the identity of the employee who has reported the alleged irregularity and the identity of the individual to whom the irregularity was reported, will remain secret. No information shall be provided to third parties in or outside the organisation and its international centres without the consent of the Chief Executive.

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Please indicate that you are calling upon the SNV Whistleblower Procedure when making your report to ensure the matter is appropriately handled/referred.

Article 3

1. Within eight weeks from his internal report, the employee shall be informed in writing by or on behalf of the CE of the official position with regard to the alleged irregularity and the action taken as a consequence of the employee's report.
2. If no response can be given within eight weeks, the employee shall be informed to that effect by or on behalf of the CE and be given an indication as to when he/she will be informed.

Section 3 – Reporting to the confidential counsellor

Article 4

1. If the employee considers reporting to his/her own manager or other person in charge inappropriate, he/she may instead report his/her concern directly to the confidential counsellor.
2. The confidential counsellor shall follow the same procedure as that which is specified in article 2.
3. Based on the nature of the report and in consultation with the employee, the confidential counsellor decides if the concern should be referred, and if so to which individual in the organisation: to the CE or the chairman of the Supervisory Board.
4. Based on the nature of the report and in consultation with the employee, the confidential counsellor can decide to inform the Dutch Works Council or the Corporate Council.

SNV's confidentiality counsellor is Mr Wim Veldman (veldman@veldmanadvies.nl) or Mr Henk Muller (h.muller38@kpnplanet.nl)

Section 4 - Reporting to the chairman of the Supervisory Board

Article 5

1. The employee can report the alleged irregularity to the chairman of the Supervisory Board as specified in article 1, if:
 - a. He or she does not agree with the position referred to in article 3;
 - b. He or she has not received notification of the position within the required term, as specified in article 3, clauses one and two;
 - c. Given all the circumstances, the term specified in article 3, clause 2, is unreasonably long and the employee has made his objection known to the CE, but the CE has not indicated a shorter, more reasonable term;
 - d. The concern regards an alleged irregularity involving the CE of the Stichting, or
 - e. There is ground for exemption as specified in the next clause.
2. The ground for exemption specified under (e) in the previous clause only applies in the following instances:
 - a. A situation in which the employee has reason to fear retaliatory measures as a result of an internal report;
 - b. A previous internal report in accordance with the procedure, of an essentially similar irregularity which did not remove this irregularity.
3. The chairman of the Supervisory Board shall make a written record of the report and of the date of its receipt and shall have the employee concerned sign the record for approval. The employee shall receive a copy of the record.
4. The chairman of the Supervisory Board shall send a confirmation of receipt to the employee who reported the alleged irregularity. If the employee has reported an alleged irregularity previously, the confirmation shall refer to the original report. Immediately after the employee's report, an investigation shall be started into the alleged irregularity, by or on behalf of the chairman of the SB.
5. In providing information, the identity of the employee who has reported the alleged irregularity and the identity of the individual to whom the irregularity was reported, will remain secret. No information shall be provided to third parties in or outside the

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organisation and its international centres without the consent of the chairman of the Supervisory Board.

Article 6

1. Within eight weeks from his internal report, the employee shall be informed in writing by or on behalf of the chairman of the Supervisory Board of the official position with regard to the alleged irregularity and the action taken as a consequence of the employee's report.
2. If no position can be given within eight weeks, the employee shall be informed to that effect by or on behalf of the chairman of the Supervisory Board and be given an indication as to when he will be informed of the SB's position.

Section 5. External reporting

Article 7

1. In case the report of a serious alleged irregularity is not dealt with in an appropriate manner (according to articles 2 up to and including 6) the employee can report the alleged irregularity externally, to the most competent authority.
2. If the employee reports the alleged irregularity externally, he or she shall notify the most competent authority. In so doing, the employee must take into account the effectiveness of this authority's ability to intervene, and its ability to eliminate or assist in eliminating the irregularity. The employee must also take into account the employer's interests in minimising any possible injury that may arise from the intervention. It is obvious that, as a general rule an external report is referred to the most competent authorities and not to the media.
3. In the case of serious irregularities, which to the judgement of the employee, imply a serious risk for the society or for certain population groups and/or if the irregularity continues despite repeated internal reports to manager, CE, SB (ref. sections 2, 3 and 4) the employee could disclose said concerns to the media.
4. The alleged irregularity must, in all cases, be more severe than the possible damage the employer encounters due to this external reporting by an employee.

Section 6 – Legal protection

Article 8

The position of employees who have reported an alleged irregularity in good faith in accordance with the stipulations of this procedure shall not be affected in any way as a result of the report. Such employees shall not suffer negative treatment if the alleged irregularity was reported with no view to personal gain.

Section 7 – Entering into effect

Article 9

This procedure comes into effect on 12 May 2011.

SNV Whistle-blower Procedure 2011:

Questions and Answers

What is the whistle blower procedure?

The SNV whistle-blower procedure is a set of measures that allow people within SNV to report alleged irregularities for investigation confidentially and without fear of prejudice, while providing clear steps and measures to resolve the issue.

Why blow the whistle?

You can 'blow the whistle' to initiate an investigation into any illegal or unethical operational or financial practices you believe have taken or are taking place within SNV.

Note that the primary consideration here should be public interest – this procedure is not intended for addressing personal grievances (disputes over personal allowance etc.), but for identifying and addressing issues which affect SNV as a wider organisation.

How do I blow the whistle?

Blowing the whistle is as simple as reporting the suspected irregularity to your manager –verbally, or in writing.

If your manager is somehow associated with the alleged irregularity or you have a sound reason not to trust your manager, you can report to another person in charge (i.e., your Country Director or regional manager), or an external confidentiality counsellor. Our confidentiality counsellor is either Mr Wim Veldman (veldman@veldmanadvies.nl) or Mr Henk Muller (h.muller38@kpnplanet.nl)

Please indicate that you are calling upon the SNV Whistleblower Procedure when making your report to ensure the matter is appropriately handled/referred.

What happens with my complaint after I have reported it?

Your manager, person in charge and/or the confidentiality counsellor will make a written record of the report, with date of receipt. You will sign the record for approval and receive a copy. The Chief Executive of SNV will also receive a copy of the record. The Chief Executive will confirm to you that he/she has been notified and received the information on the irregularity.

Your manager, or other person in charge and/or the confidentiality counsellor will start an investigation immediately.

Within eight weeks, you will be informed in writing by the Chief Executive on the status of the investigation and actions taken. If it is not possible to respond in eight weeks time, you will be contacted and informed of when you can expect the information.

How about confidentiality?

The information you provide, including your **identity**, and the identity of the individual to whom the irregularity was reported, **remains secret**. No information will be provided to internal or external parties without the consent of the Chief Executive.

Based on the nature of the report, and only in consultation with you, the Corporate Council can be informed.

And what if I feel that no sufficient action has been taken?

If you feel that the actions taken were not appropriate, you can take it one step higher and report to the Chair of the Supervisory Board (SB).

The Chair of the SB will make a written record of the report on the irregularity, with date of receipt. You will receive a copy. He/she will then start an investigation into the suspected irregularity. Again your identity will remain secret and you will be informed of the outcome within eight weeks by the Chair.

What if – despite everything – someone finds out that I reported?

If you are afraid that you will face counter measures (like bullying or termination) then you can report directly to the Chair of the Supervisory Board. He or she will protect you.

The procure clearly states that: *"the position of the employee who has reported a suspected irregularity in good faith and in accordance with the above procedure shall not be affected in any way as a result of the report. Such employees shall not suffer negative treatment if the suspected irregularity was reported with no view to personal gain."*

What if I – even after taking it to the SB – still feel that the irregularity is not dealt with in an appropriate manner?

In that case you can report the irregularity to the most competent, external, authority.

Please try to find an authority that has ability to intervene and assist in eliminating the irregularity. As a general rule, this is not the media.

Attached you can find the full text of the official procedure.