



Whistleblowing Policy and Procedure

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Definition of Terms

Complaint	An allegation or concern that is subject to investigation by the appropriate authority.
Detriment	Victimization or reprisal of a whistle-blower which can take any or a combination of the following forms; dismissal, termination, redundancy, undue influence, duress, withholding of benefit and/or entitlements and any other act that has negative impact on the whistle-blower.
Good Faith	This is evident when a report or concern is made without malice or consideration of personal benefit and the employee has a reasonable basis to believe that the report is true; provided, however, a report does not have to be proven to be true to be made in good faith. Good faith is lacking when the disclosure is known to be malicious or false.
Investigation	A process designed to gather and analyse information in order to determine whether misconduct has occurred and if so, the party or parties responsible.
Misconduct	A failure by a staff member or other relevant stakeholder to observe the rules of conduct or standards of behaviour prescribed by an organization.
Suspect	A person who is alleged to have committed a misconduct and subject of investigation.
The Organization	Comitato Collaborazione Medica An external body verifies the effectiveness of the internal procedure/rule/regulations to

The Supervisory Body	minimize and/or reduce the risk of the activity of the Organizations. It is autonomous and independent.
Whistleblower	Any person(s) including employee, management, directors, depositors, service providers, creditors and other stakeholders of an institution who reports any form of unethical behaviour or dishonesty to the appropriate authority.
Whistleblowing	The act of reporting an observed/perceived unethical misconduct of employees, management, directors and other stakeholders of an institution by an employee or other person to appropriate authority. It is an early warning system that enables an organization to find out when something is going wrong in time to take necessary corrective action.

1. Introduction

Comitato Collaborazione Medica (CCM) conducts its mission based on the principles described by its Code of Conduct. It is CCM's policy to support and encourage its stakeholders (employees, beneficiaries, firms) to report and disclose improper or illegal activities, and to fully investigate such reports and disclosures. It is also CCM's policy to address any complaints that allege acts or attempted acts of interference, reprisal, retaliation, threats, coercion or intimidation against employees who report, disclose or investigate improper or illegal activities (the "Whistleblowers") and to protect those who come forward to report such activities.

CCM assures that all reports will be treated strictly confidentially and promptly investigated and that reports can be made anonymously, if desired.

CCM's internal control and operating procedures are intended to detect and to prevent or deter improper activities. However, even the best systems of controls cannot provide absolute safeguards against irregularities. CCM has the responsibility to investigate and report to appropriate parties, allegations of suspected improper activities and to take appropriate actions. Employees and others are encouraged to use guidance provided by this policy for reporting all allegations of suspected misconduct or improper activities.

2. Objective of the Policy

This policy and procedure manual is intended to encourage staff and other relevant stakeholders to report perceived unethical or illegal conduct of employees, management, directors and other stakeholders across the organization to appropriate authorities in a confidential manner without any fear of harassment, intimidation, victimization or reprisal of anyone for raising concern(s) under this policy. Specific objectives of the policy are:

- a. To ensure all employees feel supported in speaking up in confidence and reporting matters they suspect may involve improper, unethical or inappropriate conduct within the organization;
- b. To encourage all improper, unethical or inappropriate behaviour to be identified and challenged at all levels of the organization;
- c. To provide clear procedures for reporting and handling such concern(s);
- d. To proactively prevent and deter misconduct which could impact the financial performance and damage the organization's reputation;
- e. To provide assurance that all disclosures will be handled seriously, treated as confidential and managed without fear of reprisal of any form;
- f. To help promote and develop a culture of openness, accountability and integrity.

3. Scope of the Policy

This policy and procedure manual are designed to enable employees and other relevant stakeholders to report any perceived act of impropriety, which should not be based on mere speculation, rumours and gossips but on knowledge of facts. Reportable misconducts covered under this policy include:

- All forms of financial malpractices or impropriety such as fraud, corruption, bribery, theft and concealment;
- Failure to comply with legal obligations, statutes, and regulatory directives;
- Actions detrimental to Health and Safety or the work environment;
- Any form of criminal activity;
- Improper conduct or unethical behaviour that undermines universal and core ethical values such as integrity, respect, honesty, accountability and fairness;
- Transactions not disclosed or reported in line with regulations;
- Insider abuse;
- Non-disclosure of interests;
- Sexual or physical abuse of staff, customers, prospective staff, service providers and other relevant stakeholders; and
- Attempt to conceal any of the above listed acts.
- Any breaches of the Code of Conduct of the Organization

The above listed reportable misconducts or concerns are not exhaustive. However, judgment and discretion is required to determine misconduct that should be reported under this policy. The general guide in identifying reportable misconduct is to report concerns, which are repugnant to the interest of the organization, and the general public and appropriate sanctions applied. This policy covers the activities of CCM both at HQ and in all the offices within the organization in the countries where CCM operates.

Finally, this policy does not cover individual staff grievances and other employee related matters already covered in the human resource manual of CCM at both HQ and field levels.

4. Board and Management Commitment to the Policy

The CCM Board and Management are aware that a robust internal system for employees and other relevant stakeholders to disclose workplace malpractices without fear of reprisal shows that employees take their responsibilities seriously, and helps to avoid the negative publicity that often accompanies disclosures to external parties.

Hence, the Board and Management are committed towards promoting a culture of openness, accountability and integrity, and will not tolerate any harassment, victimization or discrimination of the whistle-blower provided such disclosure is made in good faith with reasonable belief that what is being reported is fact.

5. Policy Statement

CCM is committed to the highest standards of openness, probity, accountability and high ethical behaviour by helping to foster and maintain an environment where employees and other stakeholders can act appropriately, without fear of reprisal. To maintain these standards, the organization encourages employees and relevant stakeholders who have material concerns about suspected misconduct or any breach or suspected breach of law or regulation or CCM's Ethical code that may adversely impact the organization, to come forward and report them through appropriate channels (in certain cases on a confidential basis) without fear of retribution or unfair treatment.

The organization is committed to investigate promptly any reported misconduct and to protect those who come forward to report such activities. The organization further assures that all reports shall be treated in strict confidence.

The organization's operating procedures are intended to detect and prevent or deter improper activities. However, the best systems of controls may not provide absolute safeguards against irregularities. This policy is intended to investigate and take appropriate action against any reported misconduct or concern.

6. Roles & Responsibilities

S/N	Responsible Officer	Responsibilities
1	Whistleblower	Whistle-blowers are expected to act in good faith and should refrain from making false accusations when reporting his/her concern(s), and provide further evidence at his/her disposal to aid investigation of the issues reported
2	Suspect	Suspect has a duty to cooperate with investigators during the period of investigation including provision of relevant information, documents or other materials as may be required by the investigator.
3	Investigator	<p>The investigator is expected to handle all matters with high professionalism, confidentially and promptly. He/ she shall be independent and unbiased in carrying out investigation.</p> <p>The investigator has the responsibility of acknowledging all concern(s) reported and reporting on the progress of investigation to the whistle-blower.</p> <p>The investigator shall keep the Supervisory Board informed on the investigation.</p> <p>On a quarterly basis it provides to the Executive Director a summary of all cases reported and the result of the investigation The investigator shall refrain from discussing or disclosing matters under investigation.</p>
4	Head of Human Resources	The Head of Human resources of CCM shall ensure employees are informed of the procedure and any related changes. He/she guarantees the organization's human resources manual is maintained updated. In case the investigation confirms the responsibility of CCM staff, shall support all the management across the organization in implementing disciplinary actions
5	Supervisory Body	<p>It is in charge for the management of the WB procedure and it is the recipient of complaints issued directly by whistleblowers or by other persons trusted by the whistleblowers</p> <p>The operation of the Supervisory Board within the Whistle blowing procedure is part of its wider responsibility related to the implementation of Law Decree 231/2001.</p>
5	Executive Director	The ED shall ensure the whistleblowing policy is followed correctly

7. Whistleblowing Procedure

The whistleblowing procedure involves steps that should be taken by the whistle-blower in reporting misconduct, and steps required for the investigation of the reported misconduct.

The following procedures shall guide the Whistleblowing process:

- 1) **Raising concern(s) by whistle-blower.** An internal or external whistle-blower may raise concern, by himself/herself or by trusted person, through emailing the Supervisory Board (Organismo Di Vigilanza) at odv@ccm-italia.org
- 2) **Investigation of Concerns.** The Supervisory Board will take in consideration all the concerns received
 - Establish the matter of the concern and proceed with an investigation
 - Based on the concern, asks the most competent sector or the specific internal body (for example internal auditor) to proceed with the investigation and verify the concern.
 - Ignore the concern if it is frivolous or unwarranted
- 3) **Report of Investigation and action on report.**
 - Upon conclusion of investigation, the sector or the Body in charge reports the results to the Supervisory Board. Moreover in case the concern is proved, it reports the results to Hr department in the field (CR) or at HQ level proposing the disciplinary sanctions in line with Human Resources Manual if needed or, for external supplier , the interruption of suppliers 'contract.
 - On regularly basis (each three months) the Supervisory Body shall submit a report to the Executive Director andr Board members regarding the concern(s) and suggesting, if the case, improvements/changes in the organizational procedure in order to prevent the facts can occur again
 - Based on the report the Executive Director can apply disciplinary measure in line with Human Resources Manual if needed or interrupt suppliers 'contract
- 4) **Non-Satisfaction with result of investigation/action.** In the event that the whistle-blower is not satisfied with the extent of investigation and or the action taken based on the outcome of the investigation, the whistle-blower can renovated his/her concern(s) to the Supervisory Body that will take in consideration what indicted by whistle-blower

Any whistle-blower that feels victimized can report his/her grievance(s) to the Supervisory Body that will guarantee confidentiality. This is without prejudice to the fundamental right of the internal whistle-blower to seek redress in the court of law.

8. Time Limit for Investigation

It shall be the policy of the organization to handle investigations promptly and as fairly as possible. While it might not be possible to set a specified period for the conclusion of investigation, since the diverse nature of potential concerns may make this impracticable.

9. Protection and Compensation for Whistleblower

It shall be the policy of the organization to protect whistle-blowers who disclose concerns, provided the disclosure is made:

- in the reasonable belief that it is intended to show malpractice or impropriety;
- to an appropriate person or authority;
- In good faith without malice or mischief.

While all disclosures resulting from whistleblowing shall be treated with high level of confidentiality, staff and other relevant stakeholders are encouraged to disclose their name to make the report more credible. The organization shall bear in mind the following in considering unanimous disclosure:

- seriousness of the issues being reported;
- the significance and credibility of the concern;
- the possibility of confirming the allegation.

The organization shall not subject a whistle-blower to any detriment. Where a whistle-blower feels unfairly treated owing to his/her actions, the whistle-blower shall be at liberty to report to Supervisory Body on the organization`s activities. This is without prejudice to the right to take appropriate legal action.

Any retaliation, including, but not limited to, any act of discrimination, reprisal, harassment, suspension, dismissal, demotion, vengeance or any other occupational detriment, direct or indirect, recommended, threatened or taken against a whistle-blower because he/she has made a disclosure in accordance with this policy will be treated as gross misconduct and dealt with accordingly.

Whistle-blowers must ensure that they do not make disclosure outside of the prescribed channels or their disclosures may not be protected.

10. Embedding a Strong Whistle-Blowing Regime across the organization

While regulation and best practice in governance requires entities irrespective of their size and location to have a whistleblowing policy, CCM believes that simply having a whistleblowing policy is not enough to create a culture in which employees are genuinely encouraged to disclose unethical behaviours.

In creating an enabling environment, which ensures that whistleblowing regime is effective across the organization, field offices are required to adopt the following measures:

S/N	Measures	Remark
1	Management commitment	Management at any level, field and HQ, are expected to clearly support and sponsor whistleblowing in their respective country/office. This will include respecting the policy and its procedures.
2	Communication & Training	All employees in at any level of the organization (field and HQ) should be aware of the existence of a whistleblowing regime. This can be achieved through regular emails and/or presentations and compulsory training by the CR, or Head of Human Resources Annual declaration by all staff of having read and understood the policy shall also be encouraged.
3	Proper Investigation and Action	All whistleblowing disclosures or concerns must be investigated promptly and properly, and appropriate action taken upon conclusion of investigation. Furthermore, all whistleblowing investigations shall be kept confidential.

11. Ownership and Frequency of Review

This policy document remains the property of CCM. However, its custody and management shall rest with the Executive Director, who also has oversight on the Compliance function based on the Supervisory Body reports.

This policy document and procedure manual shall be subject to review every two (2) years or as may be deemed necessary

Although this document shall be hosted in the official website of CCM, the Management of the organization and each country-based office shall ensure strict compliance with this policy.

WHISTLEBLOWER REPORT FORM

Please provide the following details for any suspected serious misconduct or any breach or suspected breach of law or regulation that may adversely affect the organization and submit directly to any of the Whistleblower Contact details. Please note that you may be called upon to assist in the investigation, if required.

REPORTER'S CONTACT INFORMATION	
<i>(This section may be left blank if the reporter wants to be anonymous)</i>	
NAME / BADGE NO.	
DESIGNATION	
DEPARTMENT/OPERATION	
CONTACT NUMBERS	
E-MAIL ADDRESS	
SUSPECT'S INFORMATION	
NAME / BADGE NO.	
DESIGNATION	
DEPARTMENT/OPERATION	
CONTACT NUMBERS	
E-MAIL ADDRESS	
WITNESS(ES) INFORMATION	
NAME	
DESIGNATION	
DEPARTMENT	
CONTACT NUMBERS	
E-MAIL ADDRESS	
ALLEGATION NO.	
COMPLAINT: <i>Briefly describe the misconduct / improper activity and how you know about it. Specify what, who, when, where and how. If there is more than one allegation, number each allegation and use as many pages as necessary.</i>	
1. What misconduct/improper activity occurred?	
2. Who committed the misconduct/improper activity?	
3. When did it happen and when did you notice it?	
4. Where did it happen?	
5. Is there any evidence that you could provide us?*	
6. Are there any other parties involved other than the suspect stated above?	
7. Do you have any other details or information, which would assist us in the investigation?	
8. Any other comments?	
Date:	Signature (Optional):

Note: * You SHOULD NOT attempt to obtain evidence for which you do not have a right of access since whistle-blowers are ‘reporting parties’ and NOT ‘investigators’.

<i>For Whistleblower Investigator Use</i>	<i>Report No.</i>
Received By	Received On:
	Acknowledgement Sent On:
Investigation Required (Yes / No)? <i>(If no, please state the reason)</i>	
Investigation Done By:	
Investigation Results:	
Action Taken / Conclusion:	
Reported to Whistleblower Committee Chairman on:	
Signed Off by:	

Whistleblowing Procedure

