

# WHISTLEBLOWING GUIDELINES

## 1. Introduction – what is whistleblowing, and why is it important?

Afrikagrupperna strives to achieve transparency and a high level of ethics. Our employees are the most important source of insight for revealing possible misconduct that needs to be addressed.

Our whistleblowing service offers a possibility to alert the organisation about suspicions of misconduct in confidence. It is an important tool for reducing risks and maintaining trust in our operations by enabling us to detect and act on possible misconduct at an early stage.

Whistleblowing can be done openly or anonymously.

The purpose of these whistleblowing guidelines is to encourage employees, partners and others to blow the whistle on suspected misconduct without any risk of retaliation, as well as to ensure an appropriate investigation process.

## 2. When to blow the whistle?

The whistleblowing service can be used to alert us about serious risks affecting individuals, our organisation, the society or the environment.

The whistleblowing service should also be used to alert improprieties concerning:

- accounting, internal accounting controls, auditing matters, fight against corruption banking- and financial crime, or
- other serious improprieties concerning the organizations or the group's vital interests or the life or health of individual persons, as for instance serious environmental crimes, major deficiencies as regards the security at the place of work and very serious forms of discrimination or harassments.
- commitments according to Afrikagrupperna's Code of conduct
- commitments according to Afrikagrupperna's Policy on Finance
- commitments according to Afrikagrupperna's Anti-corruption Policy
- commitments described in Program/Project Agreements with partner organizations
- commitments described in agreements with Sida, Radiohjälpen, and/or other donors.

What is mentioned above give examples for areas of improprieties. If you are insecure of reporting a concern, you are recommended to do so. If your complaint is considered to not fit within the whistleblowing guidelines you will be informed according to the procedure stated in chapter 5.1 below.

For issues relating to dissatisfaction in the work place or related matters, employees are asked to contact their supervisor or manager, as these issues cannot be investigated in the scope of the whistleblowing.

A person who blows the whistle does not need to have firm evidence for expressing a suspicion. However, deliberate reporting of false or malicious information is forbidden. Abuse of the whistleblowing service is a serious disciplinary offence.

Please note there are restrictions on the use of a whistleblowing service in certain countries.

### **3. Blow the Whistle**

#### **3.1 How to lodge a complaint**

There are three different ways to raise a concern:

**Alternative 1.** Contact a supervisor or manager within our organisation.

**Alternative 2.** Contact the organisation's whistleblowing team. The whistleblowing should consist of four members where the secretary general and one member auditor should always be included, the two boardmembers will be appointed by the board at the constituent boardmeeting annually and should not be boardmembers with other functions in the board (such as members of staffgroup for example). The member auditors also appoint their representative annually directly after the AGM and then send info to the secretary of the board of whom is appointed. The whistleblowing team is always offered a free digital course by whistleB.

The 2023 whistleblowing team consist of:

Louise Lindfors, Secretary General, [louise.lindfors@afrikagrupperna.se](mailto:louise.lindfors@afrikagrupperna.se)

Deniz Kellecioglu, Board Member , [deniz.kellecioglu@afrikagrupperna.se](mailto:deniz.kellecioglu@afrikagrupperna.se)

Dalinne Bojang, Board Member, [dalinne.bojang@afrikagrupperna.se](mailto:dalinne.bojang@afrikagrupperna.se)

Medlemsrevisor, Leka Kiwara

OBS: If the complaint concerns one or more persons within the team, you can choose to contact one person in the team who will be responsible for putting together a new team.

If a person raises a concern directly to a supervisor, manager or by contacting the whistleblowing team in person the case will be added manually by a whistleblowing team member in their WhistleB account and treated according to these guidelines.

**Alternative 3.** Anonymous messaging through the whistleblower case management and communication channel:

<https://report.whistleb.com/en/afrikagrupperna>

The whistleblowing channel allowing anonymous messaging is administrated by WhistleB, an external service provider<sup>1</sup>. All messages are encrypted. To ensure the anonymity of the person sending a message, WhistleB does not track IP addresses or other meta-data (data that can be related to the person sending the message). The person sending the message also remains anonymous in the subsequent dialogue with the company/organisation whistleblowing team.

Please note that WhistleB provides *- communication and management service-*. Your complaint will be managed by Afrikagrupperna's whistleblowing team.

### 3. 2 A good whistle

When lodging a complaint, you should give as correct and detailed information as possible.

- Who does/do the complaint concern? Can you name anyone?
- What has happened?
- When?
- How?
- Where?
- Is the problem a one-time occasion or reoccurring?
- Do you have any evidence such as documentation or photos?
- Other information of relevance

### 3.3 Confidentiality

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<sup>1</sup> <https://whistleb.com/sv/>

All complaints are handled with confidentiality by the parties involved. No one from the whistleblowing team, or anyone taking part of the investigation process will attempt to identify the whistleblower. However, in matters involving illegal actions and if a judicial procedure is to be conducted, it might not be possible to keep identity confidential. In such cases, the whistleblowing team will inform you and you will discuss possible actions together according to the procedure stated in chapter 5.1 below.

We encourage anybody who shares their suspicions to be open with their identity. All messages received will be handled confidentially.

## **4. The investigation process**

### **4.1 The whistleblowing team**

Access to messages received through our whistleblowing communication channel is restricted to appointed individuals with the authority to handle whistleblowing cases. Their actions are logged and handling is confidential. When needed, individuals who can add expertise may be included in the investigation process. These people can access relevant data and are also bound to confidentiality. If external expertise is to be included in the investigation process, you will be informed according to the procedure stated in chapter 5.1 below.

### **4.2 Receiving a message**

Regardless of how the whistleblowing team has received a message (see chapter 3.1) it will be inserted into the WhistleB service system for management.

Upon receiving a message, the whistleblowing team decides whether to accept or decline the message. If the message is accepted, appropriate measures for investigation will be taken, according to the procedure stated in chapter 5.1 below.

The whistleblowing team may decline to accept a message if:

- the alleged conduct is not reportable conduct under these whistleblowing guidelines
- the message has not been made in good faith or is malicious
- there is insufficient information to allow for further investigation
- the subject of the message has already been solved.

If a message includes issues not covered by the scope of these whistleblowing guidelines, the whistleblowing team should take appropriate actions to get the issue solved. If decided that no

investigation will be escalated the whistleblowing team will provide you with a motivation and recommendations on how you can proceed with your complaint.

## 5. Investigation

All messages are treated seriously and in accordance with these whistleblowing guidelines.

### 5.1 Investigation and Response Procedure

<p><b>1.</b> The complaint is received by the whistleblowing team and given a reference number. A confirmation is communicated to you through WhistleB within one week. Follow-up questions might be asked.</p>
<p><b>2.</b> An initial assessment of the complaint is performed by the whistleblowing team. Depending on the nature of the complaint additional resources are added to the team. If the complaint in any way is pointing towards any member of the whistleblowing team, the person will be removed from the whistleblowing team.</p>
<p><b>3.</b> An initial investigation is initiated. The whistleblowing team decides about possible actions pending further investigation. Depending on the nature of the complaint other stakeholders (external donors, board members) is updated on the investigation process.</p>
<p><b>4.</b> Within 3 weeks you will receive a update from the whistleblowing team. If you have chosen to be anonymous the whistleblowing team will be very restrictive about sharing information about measures taken. If the whistleblower is non-anonymous, information on the investigation process (what has been done, who have been included in the investigation process) will be shared to an extent the whistleblowing team seems fit and possible* You might receive additional follow-up questions. If the whistleblowing team decides that the complaint not will be escalated a motivation for the decision will be provided and you will be advised on on how you can proceed with your complaint.</p>
<p><b>5.</b> Depending on the result of the initial investigation the whistleblowing team decides about further actions in line with Afrikagrupperna’s policies and procedures. If necessary, an external investigation will be escalated.</p>
<p><b>6.</b> The whistleblowing team prepares an action plan with necessary measures and follow-up procedure.</p>

7. Depending on situation and relation to the whistleblower you will receive information from the whistleblowing team on the investigation and actions taken\*. Or minimum be informed that the case is handled.

\* Consideration of the privacy of the person/those against whom allegations have been made, and any other issue of confidentiality

### 5.2 Whistleblower protection in the case of non-anonymous whistleblowing

A person expressing genuine suspicion or misgiving according to these guidelines will not be at risk of losing their job or suffering any form sanctions or personal disadvantages as a result. It does not matter if the whistleblower is mistaken, provided that he or she is acting in good faith.

Subject to considerations of the privacy of those against whom allegations have been made, and any other issues of confidentiality, a non-anonymous whistleblower will be kept informed of the outcomes of the investigation into the allegations.

In cases of alleged criminal offences, the whistleblower will be informed that his/her identity may need to be disclosed during judicial proceedings.

### 5.3 Protection of, and information to, a person specified in a whistle blower message

The rights of the individuals specified in a whistleblower message are subject to the relevant data protection laws. Those affected will be entitled to the right to access data relating to themselves and should the information be incorrect, incomplete or out of date to require amendments or deletion of data.

These rights are subject to any overriding safeguarding measures required to prevent the destruction of evidence or other obstructions to the processing and investigation of the case.

### 5.4 Deletion of data

Personal data included in a whistleblowing messages and investigation documentation is deleted when the investigation is complete, with the exception of when personal data must be maintained according to other applicable laws. Deletion is carried out 30 days after completion of the investigation. Investigation documentation and whistle blower messages that are archived should be anonymised; they should not include personal data through which persons can be directly or indirectly identified.

## 6. Legal basis of the Whistleblowing guidelines



This policy is based on the EU General Data Protection Regulation and guidelines on whistleblowing from the Swedish Data Inspection Board: DIFS 2010:1.

## **7. Transfer of personal data outside the EEA**

All data is stored within the EU. There is a general prohibition on the transfer of personal data out of the European Economic Area (EEA) unless specific mechanisms are used to protect data.

**NB.** The scope of this Whistleblowing guideline does not include potential transfer of personal data from the EEA to affiliates located outside the EEA.