

CODE OF CONDUCT
COMPANY

Good news is no news, bad news is good news, and no news is bad news

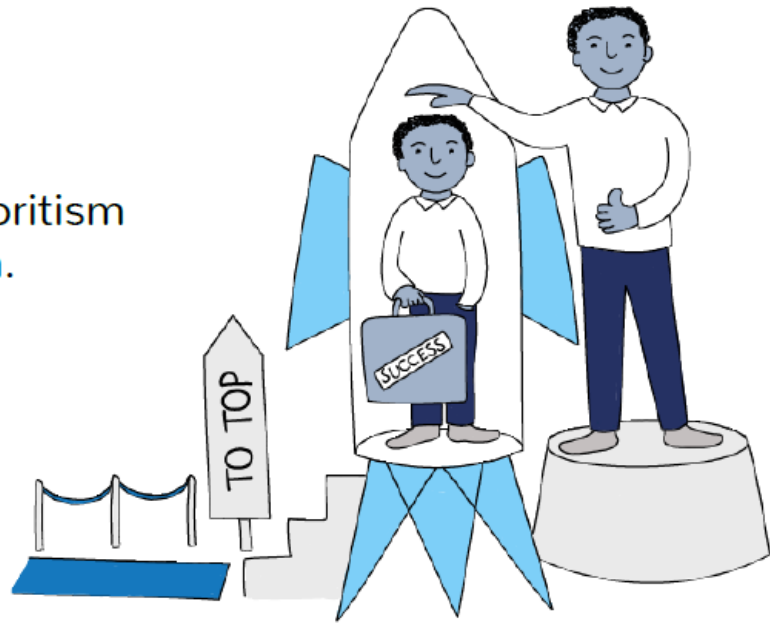
- How to change the story of your whistleblowing channel?

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67%

observed favoritism
and nepotism.



60%

observed discrimination
and bullying.

52%

observed
stealing
from work.



43%

observed sexual harrasment.



39%

observed giving,
asking for or
receiving bribes.



When you notice a concern...

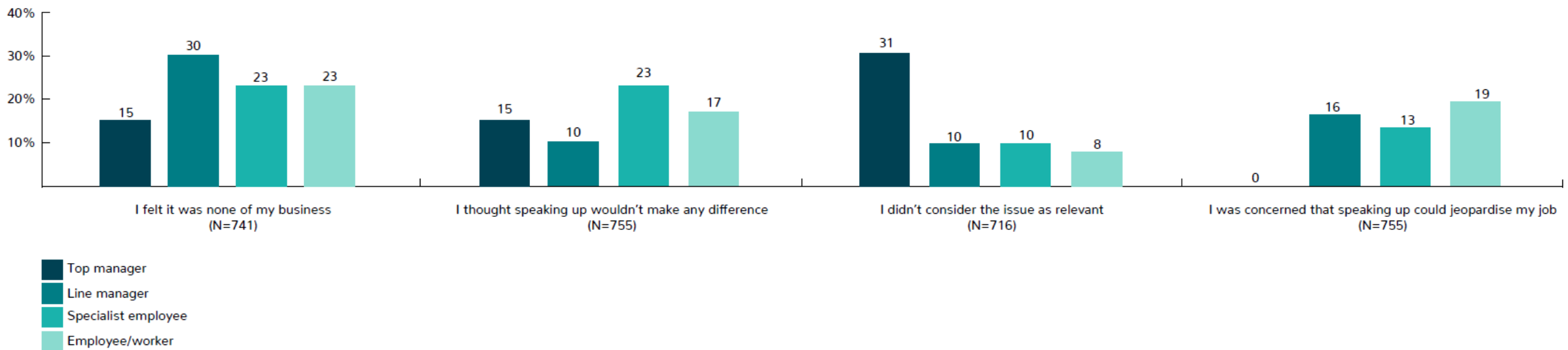
Think about how you reacted when you last time observed any of the above mentioned conduct. What did you do? - by role (N=3270)



“Every third employee does not intervene/report a concern.”

What stops us?

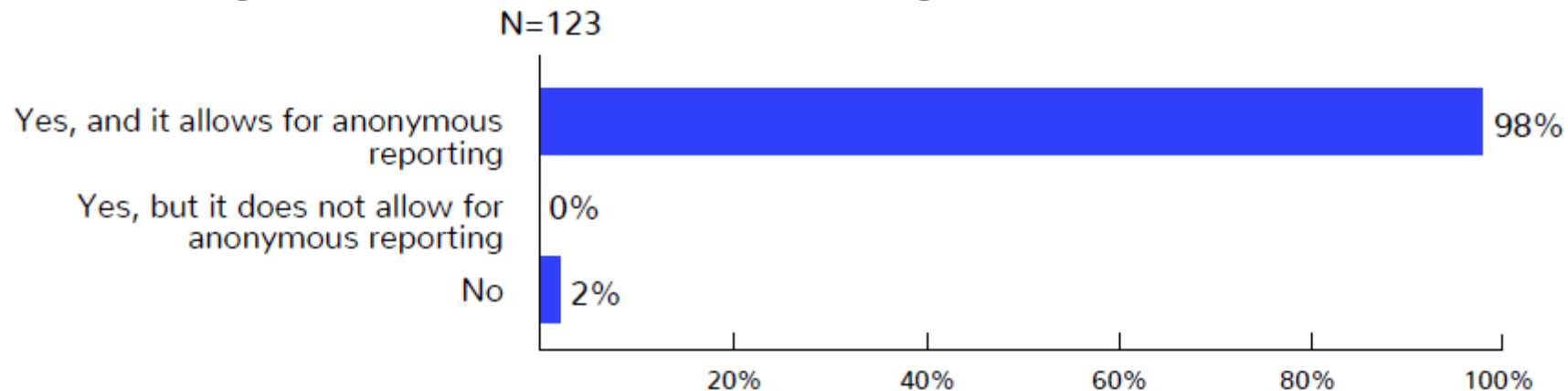
Four most common main reasons why respondents in different roles did not intervene in unethical conduct in the workplace - by role



State of whistleblowing

- The percentage of companies having anonymous whistleblowing channels has increased from 88% (2021) to 98% (2023).
- Younger employees are significantly more likely than older employees to both classify something as unethical and to report it further.

Does your organisation have a whistle-blowing channel?



Whistleblower Protection Act

- The Act on the protection of persons who report breaches of European Union and national law, the Whistleblower Protection Act, is based on the EU Whistleblowing Directive.
- The Directive obliges employers to establish an internal channel for whistleblowing within the organisation.
- It also establishes a centralised external whistleblowing channel, run by the Chancellor of Justice, to which a report could be made in certain circumstances.
- The law protects whistleblowers mainly by prohibiting any form of retaliation and protecting the identity of the whistleblower. The identity of the persons concerned must also be protected. Only designated persons can have access to the channel.
- Anonymous reporting is not a legal requirement, but a preferable option.

To follow the law, you must...

- Set up an internal notification channel
- Accept reports on pre-determined areas either in a written or oral format
- Give notice of receipt in 7 days and a notification of actions within 90 days to the notifier
- Provide information on the internal whistleblowing channel and the external channel of the Chancellor of Justice, the procedures for notification and the conditions for protection of the notifier.
- Determine the accuracy of a report
- Keep the identities of the reporter and the subject of the report confidential
- Manage processing of personal data and storage of notifications
- Not retaliate against people who report
- Pay attention to national differences in wb-laws

To strengthen a culture of doing the right thing, you should..

- Make sure everyone knows how to report a concern
- Think about how your wb-channel is called
- Clarify the difference between right and wrong
- Open the channel for matters not covered by the legislation and to external stakeholders (subcontractors, ex-employees, jobseekers, etc.) and make it anonymous
- Communicate and train the organisation (supervisors) on the channel and speak-up culture
- Make the wb-channel the last resort and communicate about other channels and how do they relate to the wb- channel
- Listen-up

from speak-up to listen-up

- 1) Understand the source of silence
- 2) Normalise difficult conversations
- 3) Clarify that supervisors/management are role models
- 4) Do not punish from honesty
- 5) Tell them what happened

Summary

- It is not just a question of the organisation having to set up a whistleblowing channel, but also the process of handling and resolving notifications and the wider message.
- If implemented with the right attitude, the channel promotes a culture of doing the right thing and a positive employee experience (speak up culture vs. culture of silence).
- Each organisation decides for itself whether the channel is a threat or an opportunity.