

# POLICY



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DANISH RED CROSS

## Whistleblower policy

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MARCH 2024

## 1 THE PURPOSE OF THE POLICY

The purpose of this whistleblower policy is to provide a framework for the Danish Red Cross whistleblower scheme, which can be used to report serious violations of law and other serious matters, including suspicion or knowledge of illegal, unethical or other irregularities relating to Danish Red Cross.

## 2 WHO IS COVERED BY THE POLICY

Danish Red Cross has decided to make the whistleblower scheme available to **everyone**.

Danish Red Cross whistleblower scheme can thus be used by persons who are not directly covered by the Danish Whistleblower Act and those who are.

This means that you can use the whistleblower scheme if you are a volunteer, employee, business partner, etc. or otherwise participate in or contribute to Danish Red Cross activities or if you become aware of serious violations of the law or other serious matters relating to Danish Red Cross.

Danish Red Cross whistleblower scheme complies with the Danish Whistleblower Act and data protection rules.

## 3 HOW TO REPORT

Reports to Danish Red Cross whistleblower scheme can be made in writing at the online whistleblower portal, which can be accessed at the Danish Red Cross website. Communication is encrypted and it is possible to communicate in the system in full anonymity.

On the whistleblower portal's reporting page, you will be asked to describe the nature of your suspicion or experience and you can provide more detailed information if you want. You can also attach any supporting documentation to the report.

## 4 WHAT CAN BE REPORTED

### 4.1 Serious offence

You can use the Danish Red Cross whistleblower scheme to report serious offenses and other serious matters that concern the Danish Red Cross. This may include, for example, suspicion or knowledge of illegal, unethical or irregular behavior, including matters concerning bribery and corruption, misuse of financial resources, theft, fraud, embezzlement and financial crime in general as well as breaches of personal data security, serious damage to the environment, conflicts of interest, cases of sexual harassment or other serious harassment, sexual exploitation or abuse, physical violence, illegal discrimination and serious or repeated violations of legislation in general. You can also report violations of rules regarding the protection of privacy and personal data as well as the security of network and information systems.

In each case, Danish Red Cross will make a specific assessment of whether the report falls within the scope of the whistleblower scheme.

#### **4.2 Internal employee relations**

If you as an employee or volunteer are dissatisfied with your terms of employment or your conditions as a volunteer, such as salary and management style and other employee matters such as cooperation difficulties, dismissal, internal conflicts among volunteers or with your manager, it should generally not be reported to the whistleblower scheme. Instead, such matters should be addressed through the normal channels, e.g., to your immediate manager, union representative, chairman or the board of your local branch. In case there is a risk of retaliation, you can use the whistleblower scheme.

### **5 ROLES AND RESPONSIBILITIES**

#### **5.1 Screening and investigation of reports**

Our external partner the law firm *Poul Schmith - Kammeradvokaten* receives all reports made through Danish Red Cross whistleblower scheme.

As a whistleblower, you will receive an acknowledgement of receipt as soon as possible and at the latest within seven days after your report have been received. You will receive a confirmation of the reporting on the whistleblower portal or via the personal contact information you have provided when submitting your report, unless you have explicitly requested otherwise or if there are reasonable grounds to assume that a receipt of reporting would jeopardize the protection of your identity.

If you make an anonymous report, you will only be able to receive the confirmation via the whistleblower portal if you save the password that you received with the submission of the report.

During the screening, it is assessed whether the reported matter is covered by the whistleblower scheme. If this is not the case, the report will not be processed further in the scheme and you will be informed accordingly. At the same time, you will be advised of where your inquiry can be directed alternatively.

If the initial screening shows that the reported matter is/may be covered by the whistleblower scheme, the report will be investigated further. The scope of the investigation depends on the specific circumstances of the case. The further investigation is generally handled by Danish Red Cross' whistleblower unit.

#### **5.2 Feedback on reports**

As a whistleblower, you will receive feedback on the status of the report within three months. You will receive feedback on the whistleblower portal or via the personal contact details you have provided with your reporting, unless you have explicitly requested otherwise or if there are reasonable grounds to believe that feedback on the report would jeopardize the protection of your identity. If you report anonymously, you will receive feedback via the whistleblower portal.

### 5.3 Good faith

Reports must be made in good faith. This means that you as a reporter must have reasonable grounds to believe that the reported circumstances are correct at the time of the report and that the circumstances are covered by the whistleblower scheme. It also means that the whistleblower scheme may not be used to report deliberately false information.

## 6 ANONYMITY, CONFIDENTIALITY AND PROTECTION OF REPORTER

You are free to choose whether your report should be anonymous or whether you want to provide your personal contact information.

If you choose to make an anonymous report, your personal data will generally not be processed. However, if you provide information in connection with your report that enables Danish Red Cross to identify you, Danish Red Cross will however be entitled to process this information.

When reporting anonymously, you must **remember to save the password** you receive when submitting your report. The password allows you to access and follow up on your report on the whistleblower portal, including communicating with Danish Red Cross whistleblower unit if further information is needed from you to investigate the matter.

As a rule, the Danish Red Cross is reluctant to use anonymous information as part of an intrusive decision, e.g., against one of the organization's employees. This may mean that a report of illegalities etc. must be closed without it being possible to conclude the case.

A whistleblower who in good faith reports matters covered by the whistleblower scheme is protected against negative consequences associated with a report, including, for example, reprimands, retaliation, change of work assignments, change of employee benefits, change of reporting requirements, damage career opportunities or reputation, as well as threats to do any of the above, or anything else that may harm you as a whistleblower.

If you, as a whistleblower, knowingly report false information, it may have negative consequences for you, including fines, employment law or contractual consequences.

Danish Red Cross' whistleblower unit treats reports confidentially in accordance with the rules on confidentiality in the Danish Whistleblower Act and the data protection rules, read more about this in the **Danish Red Cross' personal data policy for the whistleblower scheme**.

The whistleblower system does not log the IP address or machine ID of the computer from which the report is made, and the system does not use cookies. If you report from a computer owned by Danish Red Cross or connected to the Danish Red Cross network, there is a risk that the IP address and/or machine ID from which the report is made will be logged in the browser history and/or Danish Red Cross log. You can eliminate this risk by making the report from a computer that is not owned by Danish Red Cross or connected to Danish Red Cross network.

## 7 PROTECTION OF THE PERSON BEING REPORTED ON

The identity of the person(s) being reported on, or a person associated with this person, e.g. the person's spouse, will be protected during the handling of the report and will only be disclosed to persons outside Danish Red Cross whistleblower unit if it is done as part of a follow-up to a report, to address serious offenses, other serious matters or violations of EU law or as otherwise required by law.

These persons have the right to an effective defense in cases where the reported information is part of the evidence, and information about your identity as a whistleblower may be disclosed in such cases.

## 8 INTERNAL REPORTING

The Executive Board receives, at least once a year or more often as needed, an anonymous overview of registered reports during the year, with break down by number and type, for Danish Red Cross as an organization to learn, prevent and improve.

## 9 CONTACT INFORMATION

Questions about the policy should be directed to your manager, the department's HR partner or Legal unit. Questions can also be raised using the whistle blower system.