

Whistleblowing Policy

Introduction

CRED's regulations and guidelines require directors, employees, external consultants and employees of collaborative organisations to observe high standards in the conduct of their duties and responsibilities. They all must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations. They are expected to cooperate with the organisation in maintaining legal, proper, and ethical operations, if necessary by reporting non-compliant actions by other people. Correspondingly, CRED is committed to protect people who raise concerns through the complaint mechanism from being penalised in any way.

Purpose

The Whistleblower Policy meets the following objectives:

- Encourage the reporting of matters that may cause harm to individuals or financial or non-financial loss to CRED or damage to its reputation, on a confidential basis
- Enable CRED to deal with complaints in a way that will protect the identity of the whistleblower as far as possible and provide for the secure storage of the information provided;
- Establish appropriate instruments and procedures for protecting whistleblowers against reprisal and retaliatory actions by any person internal or external to the entity;
- Provide for the appropriate reporting channels.

Help to ensure CRED maintains the highest standards of ethical behaviour and integrity.

Scope

This policy applies to CRED employees and every other person working for CRED. CRED has introduced these procedures to enable employees and other persons to raise or disclose concerns about malpractice at an early stage and in the right way. They apply in all cases where there are genuine concerns, regardless of where this may be and whether the information involved is confidential or not.

The scope of this policy covers the following matters warranting complaints, including but not limited to information concerning:

- an act or omission constituting a violation of CRED policies, standards or practices;
- an act or omission constituting an offence under any provincial, national or federal legislation;
- an act or omission that creates a substantial and specific danger to the life, health or safety of persons or to the environment;
- gross mismanagement.

Protection of involved persons

- **Protection of whistleblowers:** CRED wants to protect whistleblowers. Discrimination or retaliation against any person who reports a suspected misconduct or provides evidence in good faith is not tolerated.
- **Protection of victims:** Victims must be protected as much as possible. Before any legal steps or other measures are taken with a possible impact on the well-being or integrity of victims they must be asked for their written approval.
- **Protection from false complaint:** A false accusation or misleading information might be subject to disciplinary action of appropriate degree. There will be no retaliation for honest reporting of a suspected breach of this policy.
- **Protection of confidentiality:** Confidentiality must be guaranteed by any persons involved, i.e. employees, Manager Projects, Director.

Speak up - what to do in case of a concerned potential misconduct?

We understand it is not always easy to raise concerns about possible misconduct, but we do encourage you to come forward with any concerns and speak up! Therefore, CRED has implemented the following reporting channels. Any concern will be dealt with appropriately and confidentially.

Express yourself clearly and confidently if you feel concerned about specific comments or actions of another employee or superior:

- Ask for a personal conversation: either one to one between the parties concerned or in the presence of a trustworthy person.
- Contact a trustworthy superior: This could be in our offices such as the Project Managers, Director or any other superior you can trust.
- Consult the Manager (orally or through a confidential letter), who will treat the matter with absolute confidentiality. There will be no retaliation for such reporting.
- Use our internal reporting channel: cred@cred.org.vn