

WHISTLEBLOWING POLICY

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1. INTRODUCTION

Established in 2003, WageIndicator Foundation is an independent non-profit organisation whose mission is to promote transparency in the labour market by sharing and comparing income data through its network of national websites.

WageIndicator has operations in more than 200 countries worldwide. With headquarters in Amsterdam, the Foundation has regional hubs in Bratislava, Islamabad, India and Indonesia.

2. POLICY POSITION

WageIndicator is committed to conducting its operations with honesty, transparency, and integrity in an environment of openness. However, all organisations face the risk of things going wrong from time to time or of unknowingly harbouring illegal or unethical conduct. We encourage all board members, international staff, employees (full time or part time) working across the globe, interns, consultants and contracted individuals for specific projects, and all visitors including journalists and associated personnel to report suspected wrongdoing as soon as possible and in accordance with this policy.

These concerns may be in relation to criminal activity, breach of a legal obligation (including negligence, breach of contract, breach of administrative law, safeguarding issue), miscarriage of justice, danger to health and safety

or the environment, and the cover up of any of these in the workplace. It applies whether or not the information is confidential.

Any concerns of this nature will be taken seriously and investigated. Any individual who raises genuine concerns reasonably and responsibly will not be penalised in any way, even if they turn out to be mistaken.

This policy does not form part of any employee's contract of employment, and it may be amended at any time.

The intent of this policy is to provide a framework on whistleblowing concerns that relate to internal matters.

WageIndicator does not provide pathways to whistle blow on other organisations, these should be reported within the organisation concerned.

3. PURPOSE

The purpose of this policy is to:

- Provide an internal mechanism for reporting, investigating, and remedying any wrongdoing in the workplace, and, where necessary, to alert any external individual or organisation such as a regulatory body; and
- Reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

4. SCOPE

This policy applies to all individuals working at all levels of the organisation, including board members, international staff, employees (full time or part time) working across the globe, interns, consultants and contracted individuals for specific projects, and all visitors on and offline, including journalists and associated personnel.

This policy should not be used for complaints relating to your own personal circumstances, such as a grievance about the way you have been treated at work. These should be managed through the HR department.

If you are uncertain whether something is within the scope of this policy you should seek advice from the Whistleblowing Officer, whose contact details are at the start of this policy

5. WHAT IS WHISTLEBLOWING?

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:

- A criminal offence
- The breach of legal obligation
- A miscarriage of justice
- A danger to the health and safety of an individual
- Damage to the environment
- Failure to comply with any legal obligation or regulatory requirements.
- Financial fraud or mismanagement.
- Conduct likely to damage our reputation.
- Unauthorised disclosure of confidential information.
- Deliberate attempt to conceal any of the above.





A 'whistleblower' is a person who raises a genuine concern relating to any of the above. If an individual has genuine concerns related to suspected wrongdoing or danger affecting any of the organisation's activities, they should report it under this policy. The individual has no responsibility for investigating the matter; it is the organisation's responsibility to ensure that an investigation takes place.

It is understandable that whistle-blowers are sometimes worried about possible repercussions. WageIndicator will not allow the person raising the concern to suffer any detrimental treatment for doing so. This includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern. If anyone associated with WageIndicator, particularly an employee, believes they have suffered any such treatment they should inform the Whistleblowing Officer right away. If the matter is not remedied, they should follow the escalation procedure stated below, under section 8.3.

6. GUIDING PRINCIPLES

When resolving concerns raised by whistle-blowers WageIndicator will:

- Treat any retaliation against or threats to whistle-blowers as a serious matter that may lead to disciplinary action that may include dismissal.
- Not attempt to conceal evidence of poor or unacceptable practice.
- Take disciplinary action if an employee destroys or conceals evidence of poor or unacceptable practice or misconduct.
- Ensure confidentiality clauses in employment contracts do not restrict, forbid, or penalise whistleblowing.
- Ensure any matter raised under this procedure is thoroughly and promptly investigated, and the outcome of the investigation reported back to the person who raised the issue.

7. CONFIDENTIALITY

WageIndicator hopes that staff will feel able to voice concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity confidential. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

We do not encourage staff or anyone associated with our work to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you and it is also more difficult to establish whether any allegations are credible. Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to the Whistleblowing Officer and appropriate measures can be taken to preserve confidentiality.

8. PROCEDURE

8.1. REPORTING

WageIndicator encourages staff to voice whistleblowing concerns openly with a member of the senior management team or your line manager in the first instance. You may tell them in person or put the matter in writing if you prefer. They may be able to agree on a way to resolve your concern quickly and effectively. In some cases, they may refer the matter to the Whistleblowing Officer.

However, where the matter is more serious, or you feel that your line manager or the member of the senior management team has not addressed your concern, or you prefer not to raise it with them for any reason, you should contact the Whistleblowing Officer, Karen Rutter. You can contact her on karenrutter at wageindicator dot org.

Upon receipt of your concern an investigation will be opened, and a meeting will be arranged as soon as possible. You may bring a colleague or support person to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation. You may be required to attend additional meetings in order to provide more information.

If you have any personal interest in the matter, we do ask that you tell us at the outset. If we think your concern falls more within our safeguarding, grievance resolution or other relevant procedure, we will let you know.

A written statement of your concern will be taken and a copy of this will be provided to you. We will also aim to give you an indication of how we propose to deal with the matter.

We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us from giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation confidential.

If we conclude that a whistleblower has made false allegations maliciously, the whistleblower will be subject to disciplinary action.

8.2. IF YOU ARE NOT SATISFIED

While we cannot always guarantee the outcome you are seeking, we will try to deal with any concern fairly and appropriately.

8.3. ESCALATION PROCEDURE

If you are not happy with the way in which your concern has been handled, you may contact the Director of Operations in the first instance and if you are still not satisfied then to contact the Director General and ultimately one of the Directors on the Supervisory Board of WageIndicator.

8.4. EXTERNAL REPORTING

WageIndicator will make every effort to resolve your complaint internally and in most cases, you should not find it necessary to report to anyone externally.

It will very rarely if ever be appropriate to alert the media. We strongly encourage you to allow WageIndicator to investigate your concerns before making an external report.

CONTACT DETAILS

- The Whistleblowing Officer has day-to-day operational responsibility for this policy.
- The Whistleblowing Officer is Karen Rutter. You can contact her on karenrutter at wageindicator dot org.
- You can contact the Director Operations, rupakorde at wageindicator dot org, if you are unhappy with the way your report was managed by the Whistle Blowing Officer



- **Date of Approval by the Board:** June 28, 2022
- **Date of Policy Review:** December 2025
- **Whistleblowing Officer**
 - **Name:** Karen Rutter
 - **Contact details:** karenrutter@wageindicator.org
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