

2023

SpeakUp Policy

Last updated: February 21, 2024

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1. When should I speak up?

1.1. Why is speaking up important?

IDH prioritizes an open and transparent culture where everyone feels safe. Speaking up is very important and the right thing to do. When you suspect a violation of IDH's values, the principles set out in the [Code of Conduct](#), other IDH policies or (European) laws or regulations has occurred or may occur ("Misconduct"), it is important to report this. We recognize it may not be easy to report Misconduct, however, when we know of a (potential) issue, we can address it and probably mitigate (some of the) consequences. Anyone reporting in good faith will be protected against reprisals and negative consequences after reporting a concern. This SpeakUp policy describes how you can report any suspected Misconduct and what happens after you made such report. IDH offers its reporting mechanisms internally to our staff and to anyone else outside the organization that becomes aware of (potential) Misconduct related to IDH.

1.2. What is the purpose of the SpeakUp policy?

This SpeakUp policy describes how you can raise concerns about suspected Misconduct. It also describes what happens after you raised a concern and what you can expect from IDH.

1.3. Who can speak up?

The SpeakUp policy is for all persons with an employment contract, internship contract or a service agreement with IDH. Furthermore, the SpeakUp policy is available for any third party that wishes to raise a concern about possible Misconduct with IDH or related to IDH's activities, such as implementing partners, consultants, (confidential) advisors, your employer (if applicable) and individuals and communities affected by our work.

Finally, the IDH SpeakUp policy is also for third parties who support you personally.

1.4 What concerns are covered by the SpeakUp policy?

Anyone aware of (suspected) Misconduct is obliged to report all suspicions. Misconduct includes violations of which the public interest is at stake. The public interest is in any event at stake if the act or omission affects more than just personal interest and is either part of a pattern or structural in nature or is serious or broad in scope.

A personal conflict which doesn't involve Misconduct should be reported to your manager and/or your HR Business Partner.

Examples of concerns that should be raised using this Speak Up policy include:

- Human rights violations
- Fraud
- Threats or acts of violence
- Conflicts of interest
- Bribery or corruption
- Any behaviour that restricts competition
- Discrimination
- Sexual harassment, abuse or exploitation
- Bullying
- Disclosure of confidential information
- Improper use of company resources or donor funding
- Environmental, health and safety issues
- Violation of any of our (other) policies
- Violation of any applicable (European) law or regulation

Please note this is a non-exhaustive list.

2. How do you speak up?

2.1 Speaking up internally

Our SpeakUp policy offers several ways to raise your concerns about suspected Misconduct. This allows you to pick what option works best in your specific situation. If you are not comfortable with using one of the reporting possibilities, for example because the person you would report to is involved in the Misconduct, you are encouraged to use one of the other possibilities. The reporting possibilities are as follows:



SPEAK TO YOUR MANAGER OR THE EXECUTIVE BOARD (EB)

IDH adheres to an open-door policy. You should always feel free to reach out to your people manager to discuss anything you may have on your mind. If you are not comfortable reporting to your people manager, for example because the issue concerns your manager, you are encouraged to speak to IDH's Executive Board.

SPEAK TO ONE OF IDH'S CONFIDENTIAL ADVISORS

If you feel uncomfortable to reach out to your people manager or the EB, you can discuss the issue with a confidential advisor. The confidential advisor will listen and help to find a solution where possible. Information provided to the confidential advisor will be treated as confidential and will not share such information unless you specifically requested them to do so.

The confidential advisor is a trusted person within IDH whose additional role as confidential advisor is made known to all our people. He or she can report directly to the Executive Board, is well embedded in the daily operations of IDH and has an exemplary position regarding compliance with the Code of Conduct.

IDH'S CONFIDENTIAL ADVISORS ARE:

Jan Gilhuis:	Gilhuis@idhtrade.org
Hilde Kramer:	Kramer@idhtrade.org
Beth Wagude:	Wagude@idhtrade.org
Mrinalini Prasad:	Prasad@idhtrade.org
All confidential advisors:	confidentialadvisor@idhtrade.org

REPORT USING THE SPEAKUP SYSTEM

If you are not comfortable with the above reporting possibilities or prefer to remain completely anonymous, you can use our external SpeakUp system to raise your concern in a confidential manner. The SpeakUp system is ran by an independent third party and is available 24/7/365 in twenty-one languages. There are two ways to submit a report through the SpeakUp system:



ONLINE To report Misconduct online, please visit IDH's SpeakUp system at <https://idh.speakup.report/en-GB/IDH/home> where you can fill in a form to submit your concern.



BY PHONE To report Misconduct by phone, please call the SpeakUp line in your country (free of charge). You may find your local phone number at the following link:

<https://www.idhsustainabletrade.com/speakup-phone-numbers/>

Note: If your country is not listed in the SpeakUp system, please select “the Netherlands” to file a report of your concern online. If you would like to learn more about how to report using

the SpeakUp system or how the SpeakUp system works, please refer to the Frequently Asked Questions about the SpeakUp system document, to be [found here](#).

REPORT TO THE GENERAL COUNSEL AND/OR SUPERVISORY BOARD

In case of a concern about potential misconduct of a serious nature, or potential misconduct of any member of the Executive Board, in addition to the options listed above, you can also raise your concern directly with the General Counsel (Maxime Schoonman, schoonman@idhtrade.org) and/or with the Supervisory Board of IDH (Richard Goldstein, Chair of the Audit Committee, supervisoryboard@idhtrade.org).

REPORT DIRECTLY TO IDH'S DONORS

If you have exhausted the abovementioned options and you feel your concern has not yet been adequately addressed, you can raise your concern directly to IDH's donors.

2.2 Speaking up externally

IDH strongly encourages you to raise concerns internally through one of the abovementioned possibilities. By speaking up internally, you give IDH the chance to investigate the matter and take action if needed. This way, we can improve IDH together. However, if you feel that, in the given circumstances, it cannot reasonably be requested to use the abovementioned internal mechanisms, you can also notify an external party. This can be done when this follows from a statutory regulation or in the event of:

- an acute danger, where a serious and urgent social interest creates the necessity for external notification
- a reasonable suspicion that the Executive Board is involved in the misconduct
- a situation in which you can reasonably fear the actions that would result from your internal notification
- a clear and identifiable threat of embezzlement and/or destroying of the evidence thereof
- any obligation of direct external notification
- a previous report following the internal procedure of the same Misconduct did not lead to improvement of the situation.

You can file a report with the external organization that can reasonably be regarded as the most suitable to process the report. This could be:

- an organization that is charged with the investigation of criminal acts.

- an organization that is charged with supervising the compliance with the provisions under or pursuant to any statutory regulation,
- another authorized organization where the (suspected) Misconduct can be reported, such as the “House for Whistleblowers” (in Dutch: Huis voor Klokkeluiders). The organization can provide information on which steps can be taken, and which protection is offered by the law. Please visit <https://www.huisvoorklokkeluiders.nl/> (Dutch) or <https://www.huisvoorklokkeluiders.nl/english> (English) for more information or send an e- mail to advies@huisvoorklokkeluiders.nl.

If, on reasonable grounds, you believe that the social interest supersedes the interest of IDH in confidential treatment of the report, you can file an external notification at the external organization that (based on reasonable grounds) can be deemed capable to eliminate or have the Misconduct eliminated.

3. What happens after you speak up?

3.1. What happens after you reported to your manager, the Executive Board or confidential advisor?

Once you have raised your concern with your manager, the Executive Board or one of IDH's confidential advisors, they will discuss possible next steps with you, for example, whether you want your manager to talk to the person(s) involved in the Misconduct and/or whether an investigation must be started. If you raised the concern with your manager, they will inform the confidential advisors. If you do not wish for your manager to inform the confidential advisors about your complaint, kindly inform them.

When the concern you raised is of a serious nature and warrants an investigation, your manager or the confidential advisor will draft a written record of your notification and share this with you for your approval and signature. You will also receive a copy. Your manager or the confidential advisor will forward the notification to Executive Board. When there are reasonable grounds to suspect that the Executive Board is involved with the Misconduct, the chair of the Supervisory Board will be informed instead. In that situation, all reference to the Executive Board in this policy should be read as Supervisory Board.

The Executive Board will send you a receipt of the notification. They will also appoint a first point of contact to support you in the process and to prevent you from suffering from discrimination or otherwise negative treatment as a result of raising your concern.

The Executive Board will set up an investigation committee to investigate the reported Misconduct, unless:

- There is insufficient information for an adequate investigation and there is no possibility of obtaining further information.
- It is established that the report was made in bad faith.
- It is obvious that the notification does not relate to Misconduct that is sufficiently serious to warrant an investigation.

The investigation committee shall be composed of the most appropriate persons to carry out the investigation. Please refer to paragraph 3.3 for further information on the process of an investigation.

3.2 What happens after you filed a report through IDH's SpeakUp system?

After you filed your report (either by phone or online) through IDH's SpeakUp system, you will receive a personal case number. Please ensure to save this case number. You must use it to check whether IDH has left a response for you. If you choose to remain anonymous, it is particularly important to keep your personal case number, as IDH can only contact you through the website.

All reports received via the SpeakUp system go to IDH's confidential advisors, who will evaluate and assess the information received, and determine the appropriate course of action. The confidential advisor can reply to you with feedback on your report or request you to provide additional information. The confidential advisor can decide to handle the case themselves and decide on the outcome. You will receive a confirmation of receipt within one week, with an estimate how long it will take to handle and assess your concern.

When the concern you raised is of serious nature and warrants an investigation, the confidential advisor will refer the case to an investigation committee, specifically established for your case. Please refer to paragraph 3.3 for further information about the process of an investigation.

When the concern you raised does not warrant an investigation and is, by nature, unsuitable for handling by the confidential advisor, the case will be referred to the Executive Board. The Executive Board will handle the case and decide on the outcome.

3.3. When an investigation is started

The Executive Board, the confidential advisors and the Supervisory Board all have an independent mandate to start an investigation based on the complaint received. If the Executive Board, a confidential advisor or the Supervisory Board decides that an investigation is required, they will inform you of their decision in writing within ten working days. They will inform you about the fact that they have decided to investigate the matter, their considerations and about who is conducting the investigation.

An investigation committee will conduct the investigation. The Executive Board or confidential advisor will ask independent and objective persons to be part of the committee, taking into account who is most appropriate based on the specifics of the case at hand. Under no circumstances the investigation will be conducted by persons that are involved in the possible Misconduct. The investigation committee will inform all people involved about the notification and the investigation that is conducted, unless there is a substantial risk that evidence will be destroyed, or if the investigation could otherwise be harmed by disclosing such information.

The investigation committee will interview you and other persons involved (anonymously, if so requested or deemed necessary by the investigation committee). The investigation committee will document all interviews appropriately and share the report with the interviewee for their approval and signing.

The investigation committee may also review all documents that it may find relevant for their investigation. All persons engaged in the investigation are obliged to fully co-operate and assist in the investigation.

After completion of the investigation, the investigation committee will share the draft investigation report with you and give you the opportunity to provide input and comments. Subsequently the investigation committee finalizes the investigation report and sends a copy of the final report to you. The investigation committee can decide to not share the draft and/or investigation report with you if there are compelling reasons to refrain from doing so.

The review and investigation are conducted in an independent, fair and unbiased manner with respect to all parties involved and in accordance with relevant laws and principles (including but not limited to fair hearing). Details of the case, your identity and the identity of anyone else mentioned in the report, are treated as confidential throughout and after the investigation and are only shared on a need-to-know basis. The IDH Legal Team shall supervise that the investigation is conducted in accordance with IDH's SpeakUp policy and in accordance with applicable laws and regulations.

Any person involved in an investigation must cooperate and answer all questions completely and honestly. Lying to the investigation committee as well as delaying, interfering with or refusing to cooperate with the investigation committee may lead to disciplinary measures. All parties involved, including the accused, are entitled to confidentiality in order to avoid unnecessary damage to their reputation. Therefore, if you participate in or otherwise learn about an investigation, you must keep the matter confidential.

3.4 Appropriate measures

If your concern is well-founded (i.e. the investigation committee determines that the Misconduct has indeed taken place), where necessary, appropriate measures will be taken in accordance with the law, our Code of Conduct and terms of employment. IDH aims to inform you within eight weeks after you raised your concern about IDH's position regarding the suspicion of the Misconduct. If the Executive Board cannot inform you in time, you will be informed of this delay in writing, together with the new estimated date for notification of IDH's position. The term for notification can be extended with a maximum of four additional weeks. You will be given the opportunity to respond to the position of IDH.

After the investigation has been finalized, the Executive Board will decide if an external organization should be informed about the outcomes of the investigation. You will be notified if the Executive Board decides to inform an external organization unless there are serious objections against notifying you.

3.5 What to do if you have a concern about the follow-up on a report?

If you believe that your concern or a concern raised against you:

- has not been dealt with appropriately,
- that an investigation was not performed correctly,
- if you have not been informed by the Executive Board about the position of the organization within the term as referred to in paragraph 3.4; or
- if the investigation report or the position of IDH reflect material inaccuracies.

You can raise this issue with to the Executive Board, or, if the matter concerns the Executive Board, with the Supervisory Board. The Executive Board or the Supervisory Board will respond to your concern and may issue a new or additional investigation, if necessary. The process described in paragraphs 3.1, 3.2 and 3.3 will apply to this additional investigation. You can also report your concerns about the above-mentioned situations externally , as described in paragraph 2.2.

4. Protection of your position

4.1. Do reports remain confidential?

All reporting remains confidential. This means that information about your concern will only be shared with a limited number of people and on a strict need-to-know basis. The third party that hosts the SpeakUp system will never disclose voice-file, IP addresses or phone numbers, unless one of the following situations apply:

- In cases where it is established that a report has been made in bad faith, or
- If the report itself is a criminal offence (e.g. a serious threat).

In these situations, voice file, IP addresses phone might be handed over to the authorities, but never to IDH.

IDH will only disclose information if we are required to do so by law or if an important public interest is at stake. We are however obliged to inform the implicated person that a complaint has been filed against them. Your identity will not be disclosed. The implicated person will not be informed when there is a substantial risk of destruction of evidence or impediment to the investigation. Please remember that you should also keep the matter confidential and not discuss your report with colleagues or anyone else.

4.2. Is it possible to report anonymously?

You can share your concerns anonymously. The SpeakUp system is the best way to do so. Please be aware that it is generally more difficult to investigate anonymous reports.

4.3. How will you be protected when you speak up?

At IDH, we believe speaking up is very important and the right thing to do. IDH prioritizes an open and transparent culture where everyone feels safe. Please feel confident that you will not face reprisals or negative consequences for reporting a concern or allegation in good faith about suspected Misconduct.

You will not be protected if you maliciously raise a concern that you know is false. Reporting in bad faith is considered a breach of the Code of Conduct and may lead to disciplinary measures.

Review and investigation are conducted in an independent, fair and unbiased manner with respect to all parties involved and in accordance with relevant laws and principles (including fair hearing).

4.4. What should you do if you notice any retaliation?

Retaliation against persons who speak up is taken very seriously and may lead to disciplinary measures. If you notice any retaliation or punishment against you or anyone else for raising a concern in good faith, please report this via the reporting channels described above in paragraph 2.1. A report on retaliation will follow the same procedure as other reports.

Any form of threat or retaliation will not be tolerated.

5. Protection of the accused

5.1 What happens when you are accused of misconduct?

If you are officially under investigation, or if you are otherwise included in a report, you will be notified. IDH will inform you as soon as possible and in any event within three business days. IDH may refrain from notifying you, or delay such notification, if there is a substantial risk of destruction of evidence or impediment to the investigation.

5.2 How will you be protected when you are accused?

All parties involved, including the accused, are entitled to confidentiality in order to avoid unnecessary damage to their reputation. For more information on confidentiality, please refer to paragraph 4.1.

Review and investigation are conducted in an independent, fair and unbiased manner with respect to all parties involved and in accordance with relevant laws and principles (including fair hearing).

5.3 What happens when the accusation is well-founded (i.e. misconduct has indeed taken place)?

When the investigation shows you were involved in Misconduct, where necessary, appropriate measures will be taken in accordance with the law, our Code of Conduct and terms of employment.

5.4 What to do if you have a concern about the follow-up on a matter?

Please refer to paragraph 3.5 for further information on what you can do if you believe that a concern raised against you has not been dealt with appropriately, that an investigation was not performed correctly or if you have any other concerns about the follow-up of a matter raised against you.

6. Data protection & privacy

6.1. How will your privacy be safeguarded?

IDH is committed to protecting the privacy of everyone involved. The SpeakUp policy relies on the processing of personal data, therefore, IDH complies with applicable data protection laws and regulations. Any personal data obtained as part of this SpeakUp policy will only be used for the purpose explained in this policy, for IDH's legitimate interests to ensure compliance with IDH's policies and procedures, for IDH to comply with the law or important public interest and of detecting misconduct that otherwise would not be detected. Please find out more details on the protection of personal data in the [IDH Privacy Statement for employees and associates](#), the [IDH Privacy Statement for suppliers and business partners](#), or on IDH's website via the 'Our Policies' tab on the ['About' webpage](#).

7. More information?

If you have questions relating to this SpeakUp policy or if you require further assistance, please contact:

- Your dedicated Legal Counsel, or
- The confidential advisors at: confidentialadvisor@idhtrade.org

