

GUIDELINE FOR REPORTING CODE OF CONDUCT VIOLATIONS

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Approved by:	Head of Legal & Compliance
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Binding for:	All employees of Welthungerhilfe (Association and Foundation) All freelancers working for Welthungerhilfe

1. Introduction

We –Welthungerhilfe¹ (“**WHH**”)- are committed to a world without hunger and poverty and to promoting the human right to food. Our vision is a world in which all people can lead a self-determined life in dignity and justice, free from hunger and poverty.

We work in very fragile contexts. Therefore, we take particular care to safeguard that we do no harm to people through or in the course of our work. Therefore, we set the highest standards of integrity, transparency, and accountability for ourselves and for the implementation of our projects and programs. Those standards go beyond just complying with the law. They are reflected in our Code of Conduct² (“**CoC**”) and accompanying policies and are a core element and foundation to materialize our vision and mission.

2. Objective

This Guideline for the Reporting of Concerns (“**Guideline**”) shall give guidance to everybody who suspects any potential or real violation of our CoC on how to report such concern and clarify how WHH handles such reported concerns. For that purpose, WHH implemented a Complaints Response Mechanism (“**CRM**”) with various Reporting Channels. Our ultimate objective is to identify, prevent and follow-up on any suspected or known misconduct or violation of our CoC. Thereby we can best protect WHH and its employees, our programs and projects and foremost all people who are in the focus of our work.

3. Scope of Application

3.1 Who can or should report a Violation?

Employees

All WHH employees, including members of Executive Management, (jointly “**Employee**”) have the duty to report all known or suspected violations of our CoC, and related policies and procedures (“**Violation(s)**”). Knowingly failing to report or otherwise condoning a Violation may lead to disciplinary action.

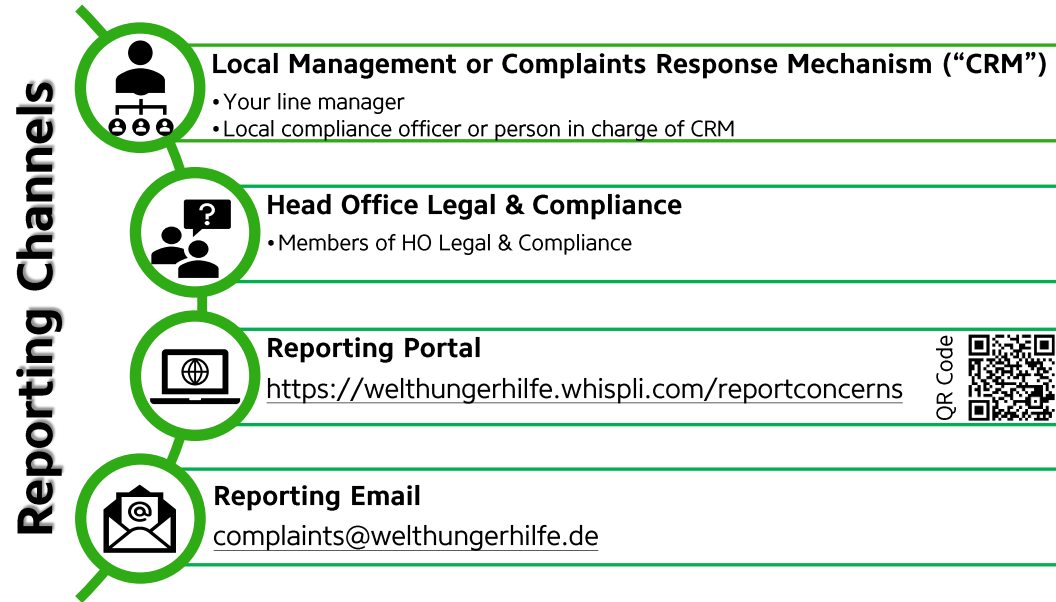
Third parties

Reporting of Violation is also open to third parties who are not Employees and are not subject to a reporting obligation. We encourage everyone who has reasons to believe that WHH -whether through our Employees, partner organizations or service providers- in the context of exercising WHH’s statutory mandate or of implementing WHH projects is not acting within the provisions of WHH’s CoC to report such concern.

¹ Welthungerhilfe: This term refers to both the association Deutsche Welthungerhilfe e.V. (“Association”) and the foundation Deutsche Welthungerhilfe (“Foundation”).

² [Link](#) to CoC

3.2 Where to report a Violation?

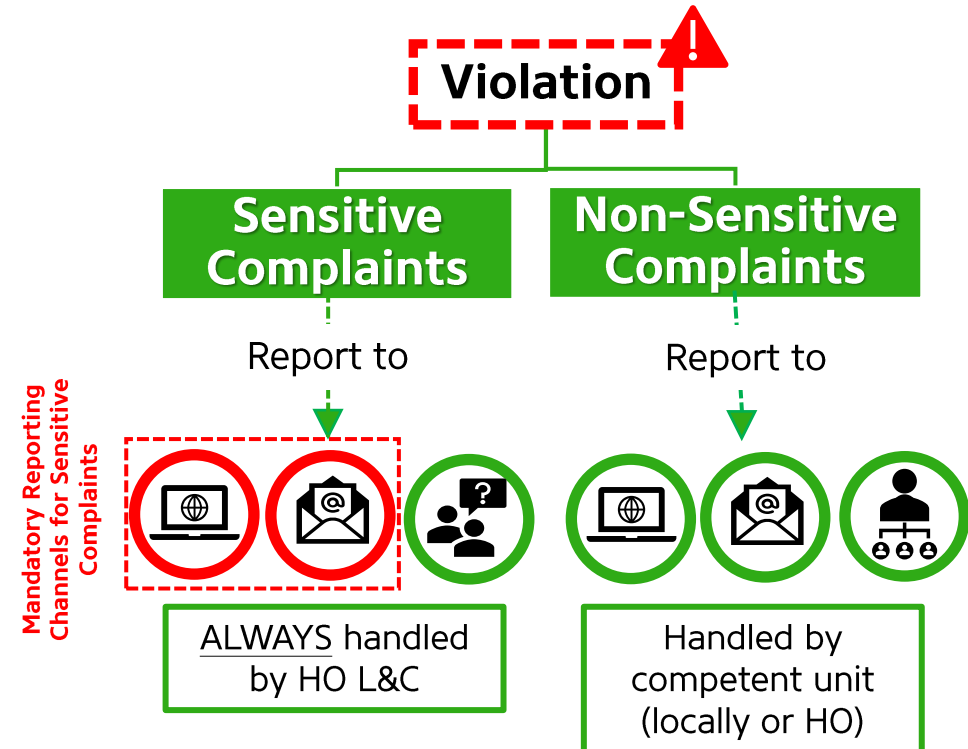


You can choose the reporting channel (“**Reporting Channels**”) that you feel most comfortable with. As a general principle, it is advisable that you report your concerns to your direct line manager, local compliance officer, country director or the person formally appointed by WHH to receive reports related to Violations, as they will be able to give proper guidance. Alternatively, you can always contact Head Office Legal & Compliance (“**HO L&C**”) for advice. Furthermore, you can use two secure electronic Reporting Channels: a website-portal (“**Reporting Portal**”) and an Email address (“**Reporting Email**” jointly with the Reporting Portal, “**HO Reporting Channels**”).

Sensitive Complaints must be reported through HO Reporting Channels as explained in subsection 3.3. Further detail on how to use the HO Reporting Channels is provided in section 5. of this Guideline.

3.3 What type of Violation needs to be reported who handles them?

All Violation –whether classified as **Sensitive Complaints** or **Non-Sensitive Complaints**– must be reported.



³ For countries or projects that the HO Reporting Channels are not accessible for specific reasons, reports must be submitted through the alternative channel or Local CRM set up in each place.

Sensitive Complaints



Fraud & Theft



Corruption



Conflict of interest



Terrorist financing & support



Data privacy



Safeguarding - Sexualized violence
(abuse, exploitation, harassment)



Safeguarding - Child abuse
(child labor, violence)

Non-Sensitive Complaints



Non-sexualized harassment
(Harassment, bullying, discrimination, retaliation)



People management
(Recruitment, training)



Information security



Procurement Operational



Other CoC violation

All Sensitive Complaints must be reported through the HO Reporting Channels as the handling of Sensitive Complaints must always be managed by HO L&C irrespective of the location of the Violation. HO L&C may coordinate its investigation of Sensitive Complaints with other units or professional service providers on a case-by-case basis. All reports related to a Sensitive Complaint submitted via local reporting channels (“**Local CRM⁴**”) or to the country management must be reported on by the receiving functions via a HO Reporting Channel for further handling. Non-Sensitive Complaints (relating to e.g. procurement, project operations, HR-management, information security, or other CoC breaches) should be reported directly to the appropriate unit within WHH (either in the HO or Country Office/Project).

4. Principles related to Reporting Violations

4.1 Protection of the Reporter

We guarantee the protection of the Reporter. We strongly repudiate any form of retaliation or other repercussions against the Reporter who reports in good faith. No Reporter needs to fear any disadvantage or other negative consequences when the report is submitted with good faith even if the report later turns out to be unfounded. However, ill-intended reports will not be tolerated; ill-intended reports constitute a violation of our CoC, and we will apply appropriate counter measures.

4.2 Confidentiality

We will maintain utmost confidentiality of the identity of the Reporter if known. We will handle all information obtained in the context of a report on a strict need-to-know basis; we will share information under strict confidentiality and only to the extent required - in our reasonable discretion - to adequately progress the investigation. All persons involved in the investigation of reports are bound by adequate confidentiality obligations. Note, however, that WHH may be legally or organizationally obliged, to disclose limited information to its donors or if requested by competent courts or authorities.

To preserve integrity of the investigation, it is important that also the reporter keeps confidentiality and does not share the fact that they submitted a complaint or the content of the complaint with persons not involved in the investigation.

4.3 Anonymity

Reporters decide in their own discretion, whether they would want to disclose their identity. Reports can be always submitted anonymously. In that case we still appreciate if Reporters report their concern via the Reporting Portal which helps WHH to communicate with them anonymously and thus to follow-up on their concern more efficiently and effectively.

4.4 Timely report

Violations should be reported without delay in order to enable us to take appropriate action to avoid occurrence or re-occurrence of alleged incidents or mitigate damages while taking proper safeguards to protect victims, survivors and assets. Do not wait for proof before reporting and do not assume someone else will report.

4.5 Do not investigate

Employees who suspect a Violation or become aware of any Violation, must not investigate the Violation themselves. Such own, uncoordinated investigations may frustrate the investigation results and may endanger people potentially affected by or investigating an alleged Violation. Instead, such Violations must be reported pursuant to this Guideline and WHH will take an appropriate follow-up steps.

5. How does the reporting process work?

5.1 How to report through the Reporting Portal?



The Reporting Portal is secure, independent and available 24/7. Reporters can speak up to us about CoC related violations or concerns (“**Report(s)**”) in a safe environment. It is designed to make confidential, anonymous or name-based, and professionally documented Reports by completing a predefined questionnaire in the language chosen by the Reporter.

Submission of a Report on the Reporting Portal can be done following below steps:

① Access the Reporting Portal

- ✓ You can either access to the link or scan the QR code.

<https://welthungerhilfe.whispli.com/reportconcerns>



- ✓ Reporters can either login via personalized user account (“**User**”) or as a guest (“**Guest**”). Anonymity will be ensured in both cases, as well as the access to a secure inbox via which all confidential communication between Reporter and WHH will be channeled. However, we encourage Reporters to register as User as this enables the access to further

functionalities (such as automatic notifications) which will facilitate the follow-up on their Report.

- ✓ When submitting a Report as a Guest you will be provided with a code after the submission is completed. It is important that you save this Code as it will be necessary to access the Reporting Portal and follow-up on your Report.

② Create and send your Report

- ✓ Complete the Reporting Form and provide as many information as possible. You can also attach files. Once you feel comfortable about your Report, you can decide to send it to us. If you report as User, you can save your Report as a draft to complete and submit it later. Once the Report is submitted, you will receive a confirmation message.

③ Follow-up on your Report

- ✓ HO L&C will receive your Report and will start a two-way confidential communication with you. By logging back into the Reporting Portal, you can chat and exchange messages anonymously or on a name basis with HO L&C and provide additional information.

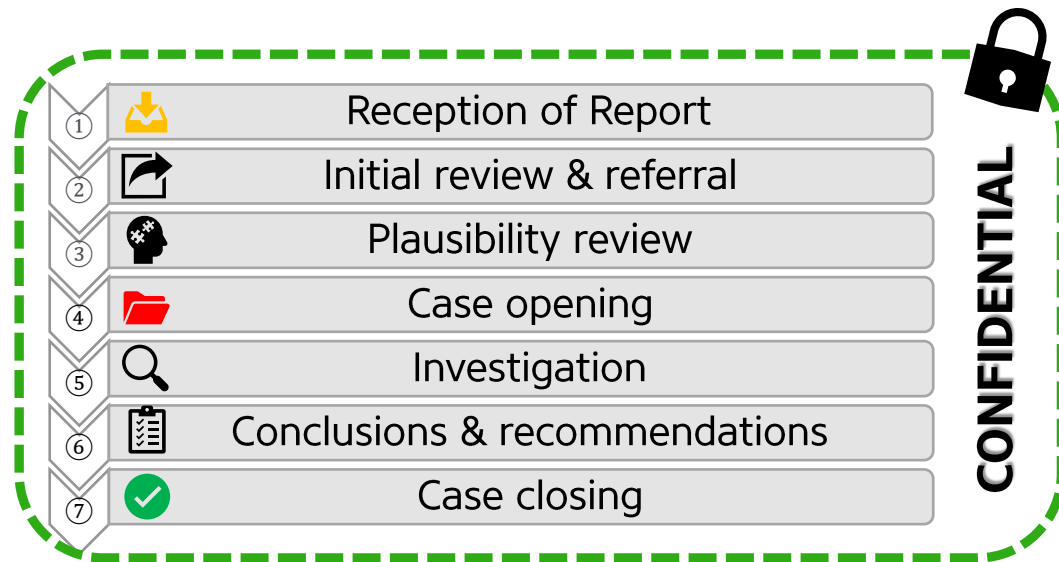
5.2 How to report through the Reporting Email?



You can send an Email to complaints@welthungerhilfe.de (“**Email Address**”) detailing the concern or the Violation. HO L&C will receive your Report and will start a two-way confidential communication with you. However, we recommend to use the Reporting Portal as it is the Reporting Channel with the most robust confidentiality and security protection.

5.3 What happens after reporting a Violation?

To safeguard a professional, confidential and adequate investigation, the investigation follows the following seven standard steps:



① Receipt of the Report

Within two working days (Mo – Fri, except for public holidays in Germany) the Reporter a confirmation of receipt shall be sent to the Reporter. At the same time, the HO L&C complaints handling team performs a first summary review to decide whether the Report covers a Sensitive Complaint or a Non-Sensitive Complaint.

② Initial review and referral

For each Report, a person responsible for the Report will be determined (“**Case Manager**”). If the report covers a Sensitive Complaint, a HO L&C member will be assigned as Case Manager. If the Reports covers a Non-Sensitive Complaint, the Report is referred to the responsible Unit for further handling. If necessary, proper interim mitigation and protection measures are taken at this point.

③ Plausibility review

Before initiating investigation, the Case Manager reviews the Report to make sure the reported information is plausible and there are enough grounds to open a case. If the Report lacks sufficient plausible information, the Case Manager contacts the Reporter to gather further information to determine whether an investigation is necessary.

④ Case opening

If the Report is plausible, the Case Manager opens a case (“**Case**”) and launches an investigation (“**Investigation**”) to further verify and assess the facts of the alleged Violation.

⑤ Investigation

The investigation is conducted to determine whether the reported alleged Violation can be confirmed based on proven facts. To this aim, relevant documents are reviewed, witnesses are heard, and the investigation results are neutrally analyzed.

All investigation measures and results are duly documented. Confidentiality, neutrality, and objectivity are the main principles that guide the Case Manager to protect the integrity of the investigation as well as potential survivors, victim(s), Reporter(s) and person(s) subject to the Investigation.

⑥ Conclusions and recommendations

After completing the Investigation, the Case Manager issues a report specifying if the Violation occurred or not. For confidentiality reasons, this report is only shared with individuals who have a legitimate need to know the investigation results. The Case Manager may also issue reasonable improvement recommendations -even if the Violation was unsubstantiated- to mitigate the risk of future Violations, and/or avoid misunderstandings in the future.

⑦ Case closing

After issuance of the investigation report the Case Manager will discuss conclusions and recommendations with responsible functions in WHH. Thereafter, the HO L&C closes the Case; Safeguarding cases can only be closed with the approval of Executive Management. The Reporter will receive a notification on the closure and the outcome of the Investigation to the extent appropriate or permitted by law. If the Case pertains to a donor funded project, WHH will inform that donor about the investigation results while maintaining confidentiality.