

WHISTLEBLOWING · GOVERNANCE

Whistleblowing

▲ 8 chapters

▲ Foundations, implementation, governance, handling of reports and case studies

8 CHAPTERS

▲ Training programme

1 Foundations of Whistleblowing

1.1 Purpose and Principles

- Definition and Scope
- Reportable Situations
- Eligible Reporters

1.2 Protection Framework

- Confidentiality
- Prohibition of Retaliation
- Roles and Responsibilities

2 Whistleblowing Framework Implementation

2.1 Internal Policy

- Clear and Accessible Policy
- Practical Guidance

2.3 Training and Awareness

- General Staff Training

2.2 Reporting Channels

- Secure and Independent Channels
- Accessibility and Trust

- Managers and Key Functions

3 Governance, Culture and Ethics

3.1 Transparency Culture

- Speak-Up Mindset
- Managing Silence Risks

3.3 Consistency and Credibility

- Fair Treatment

3.2 Leadership and Tone from the Top

- Exemplary Leadership
- Managerial Responsibilities

- Organisational Coherence

4 Integration with Compliance Framework

4.1 AML and KYC

- Complementary Role
- Qualitative Risk Alerts

4.3 Code of Conduct and Discipline

- From Rules to Action

4.2 Conflicts of Interest

- Identification and Disclosure
- Secure Escalation

- Proportionate Sanctions

5 Handling of Reports

5.1 Investigation Process

- Assessment and Analysis
- Confidential Treatment

5.2 Unfounded Alerts

- Good-Faith Errors
- Abuse of the System
- Feedback to Reporters

6 Continuous Improvement

6.1 Audits and Controls

- Compliance Reviews
- Data Security

6.2 User Feedback

- Practical Issues
- System Enhancements

7 Case Studies

7.1 Internal Case Study

- Conflict of Interest Scenario
- Decision-Making Process

7.2 External Case Studies

- Ignored Alerts
- Governance Failures

8 Conclusion

- Key Messages
- Individual Responsibility
- Ethical and Sustainable Culture

KEY MESSAGE

An ethical and sustainable culture rests on everyone's responsibility.