



## **PROCEDURES FOR WHISTLE-BLOWERS IN WWF-NORWAY**

### **What is whistle-blowing?**

- To be a whistle-blower is to speak up about possible misconduct in the workplace. This includes, among other things, acts of criminal nature, other crimes and violations of the organizations internal rules and / or ethical guidelines. The right to warn is regulated in arbeidsmiljøloven § 2-4 \*).

### **Why is whistle-blowing necessary?**

- By getting information about possible misconduct in the organization, the employer can clear up and improve the situation.
- This will ensure that crimes and other misconduct will be avoided in the organization, which can create a better working environment.
- Your information can help the organization achieve this.

### **Who should you blow the whistle to?**

- You can always notify your immediate supervisor, and also other persons in the Management Team.
- You can also notify the union representative (tillitsvalgt), the safety representative (verneombud) or HSE (arbeidsmiljøutvalg), which in turn will take the inquiry to the appropriate organization.
- If the information in any specific case involves the leaders in the organisation, and / or you lack any response from the first given notification, please contact the Chairperson of the WWF-Norway Board (insert link to Board contact info).
- Alternatively, employees can make a report by calling an independent special phone line that will be answered by an outside company – engaged by WWF International for all WWF offices. The information provided will be forwarded promptly to WWF for investigation. Callers to the special hotline may remain anonymous if they wish. The special phone no is: 800 14 870. You will then reach Expolink, which is based in the UK. You may ask for an interpreter if you want to speak in Norwegian.
- You always have the right to notify the relevant matters to public authorities such as Arbeidstilsynet, Økokrim and Konkurransetilsynet, but it is desirable that the warning first be given internally.

### **In which ways can you blow the whistle?**

- You can notify in writing, or orally.
- Oral notification can be given by phone or directly to one of those listed above.
- Written notification can be given by letter, e-mail or fax.
- Notification can be made anonymously, but it is desirable that you provide your identity in order for the organization to investigate as thoroughly as possible. This also ensures the best possible result.



- The whistle-blowers name shall be held confidential, only known for the person(s) in charge of handling the case.

#### **Follow-up of an alert**

- As long as the company knows who the whistle-blower is, he/she should always receive feedback as soon as possible about how the issue is being processed.
- As far as possible, he/she should also get feedback on the outcome of the issue. In the case that no misconduct is revealed during the investigation, he/she will also receive feedback about this.
- The whistle-blower is protected from retaliation as a result of the notification given. This is regulated in arbeidsmiljøloven § 2-5 \*\*). Should he/she experience any form of retaliation, he/she should immediately inform the Secretary General, the Head of Administration or the Chairperson of the WWF-Norway Board.
- Any person informed about retaliation will address this urgently.

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#### **\*)Arbeidsmiljølovens § 2-4. Varsling om kritikkverdige forhold i virksomheten**

(1) Arbeidstaker har rett til å varsle om kritikkverdige forhold i virksomheten.

(2) Arbeidstakers fremgangsmåte ved varslingen skal være forsvarlig. Arbeidstaker har uansett rett til å varsle i samsvar med varslingsplikt eller virksomhetens rutiner for varsling. Det samme gjelder varsling til tilsynsmyndigheter eller andre offentlige myndigheter.

(3) Arbeidsgiver har bevisbyrden for at varsling har skjedd i strid med denne bestemmelsen.

#### **Health and Safety at Work Act §2-4 Whistle blowing in the enterprise**

(1) The employee has the right to blow the whistle on misconduct in the enterprise

(2) The employee shall follow an appropriate procedure in connection with such notification. The employee has notwithstanding the right to notify in accordance with the duty to notify or the undertaking's routines for notification. The same applies to notification to supervisory authorities or other public authorities.

(3) The employer has the burden of proof that whistle-blowing has been made in breach of this provision. .

#### **\*\*\*) Arbeidsmiljøloven § 2-5. Vern mot gjengjeldelse ved varsling**

(1) Gjengjeldelse mot arbeidstaker som varsler i samsvar med § 2-4 er forbudt. Dersom arbeidstaker fremlegger opplysninger som gir grunn til å tro at det har funnet sted gjengjeldelse i strid med første punktum, skal det legges til grunn at slik gjengjeldelse har funnet sted hvis ikke arbeidsgiveren sannsynliggjør noe annet.

(2) Første ledd gjelder tilsvarende ved gjengjeldelse mot arbeidstaker som gir til kjenne at retten til å varsle etter § 2-4 vil bli brukt, for eksempel ved å fremskaffe opplysninger.

(3) Den som er blitt utsatt for gjengjeldelse i strid med første eller andre ledd, kan kreve oppreisning uten hensyn til arbeidsgivers skyld. Oppreisningen fastsettes til det beløp som retten finner rimelig under hensyn til partenes forhold og omstendighetene for øvrig. Erstatning for økonomisk tap kan kreves etter alminnelige regler.

#### **Health and Safety at Work Act §2-5 Protection from retaliation after whistle-blowing**

(1) Retaliation against any employee who has blown the whistle in accordance with §2-4 is prohibited. If the employee puts forward information that gives reason to believe that retaliation in defiance of first sentence, it will be taken for basis that such retaliation has occurred unless the employer substantiates otherwise.

(2) Regulation 1 applies corresponding to retaliation against any employee who makes known that the right to blow the whistle according to §2-4 will be exercised, i.e. by providing information.

(3) He/she who has been exposed to retaliation in defiance of regulation 1 or 2, can claim damages for non-economic loss without taking into account the employer's fault. The damage for non-economic loss will be determined to the amount the court of law finds reasonable with regard to the parties' conditions and the circumstances incidentally. Compensation for financial loss can be claimed according to ordinary regulations.