



---

## Policy on Whistleblowing and Protection from Retaliation

## 1. General objective:

CGIAR is committed to the highest standards of accountability and transparency and to ensuring that its operations and resources are managed efficiently, ethically and lawfully. In accordance with its CGIAR Core Ethical Values,<sup>1</sup> CGIAR is also committed to fostering a diverse, inclusive, fair and safe working environment and a work culture where individuals are encouraged to speak up against wrongdoings.

We want to be an ethical organization that achieves the desired impact as described in the 2030 Research and Innovation Strategy. CGIAR Staff and partners come from different backgrounds, cultures, and experiences. An important element of accountability and transparency is the ability for individuals, including but not limited to CGIAR Staff, to report their concerns about unlawful or unethical conduct in a responsible and effective way without fear of retaliation.

The purpose of this Policy is to assist and enable individuals to report reasonably held suspicions of misconduct internally so that CGIAR can address and correct improper conduct and protect those who report such concerns from retaliation. The protections under this Policy extend also to individuals who engage in any protected activity as defined under this Policy.

## 2. Scope

2.1. This Policy applies to all CGIAR staff, temporary staff, long-term consultants, trainees, interns, and students (“Staff” or “Staff members”). Third parties, including consultants, contractors, vendors, representatives, and partners are obliged to report concerns of wrongdoings through the established reporting mechanisms.

## 3. Definitions

3.1. **Retaliation** refers to any direct or indirect unjustified detrimental action or omission that is recommended, threatened, or taken because an individual has engaged in a protected activity. Retaliation may include adverse administrative actions, such as, but not limited to:

- a) Termination of employment
- b) Unjustified demotion or reduction in base salary
- c) Denial of opportunities for promotion
- d) Unwarranted poor performance appraisals
- e) Changes in job duties or other negative decisions affecting the individual’s terms and conditions of employment
- f) Withholding of resources for work assignments
- g) Deliberately causing professional harm within the scientific community
- h) Unjustified denial of authorship on publications or research papers.

3.2. **Protected activity** refers to any of the following:

- a) Reporting suspicions of misconduct through the established reporting mechanisms

---

<sup>1</sup> CGIAR Ethics Framework (endorsed by the System Management Board on 3 October 2019): Core Ethical Values (Integrity, Dignity and Respect, Sustainability, Excellence and Innovation, Partnership).

- b) Assisting a whistleblower who reports suspicions of misconduct through the established reporting mechanisms
  - c) Cooperating with a duly authorized investigation (for example, as a witness in an investigation following a report of suspected misconduct) or audit procedure
  - d) Having recourse to the Center- specific grievance and dispute settlement process or the procedures established in the CGIAR Dispute Resolution Policy, as applicable.
- 3.3. **Whistleblower** refers to an individual who reports in good faith a reasonably held suspicion of a possible wrongdoing or an actual or potential violation of CGIAR's rules, policies or procedures or of applicable local laws.

#### 4. Policy Statements

##### Reporting Obligations

- 4.1. Staff must be risk aware and have a duty to report actual or possible violations of CGIAR's rules, policies, or procedures and/or of applicable local laws that may come to their attention to help protect the people potentially affected, as well as CGIAR and its resources.

CGIAR also encourages partners to report their concerns of wrongdoings through the established reporting mechanisms.

- 4.2. Reports of suspicions of misconduct should be made in accordance with the relevant procedure on handling reports of misconduct. There are multiple places to file reports, including:
- a) The individual's Direct Manager or other Senior Manager who shall promptly direct the report to Ethics and Business Conduct and Human Resources or Internal Audit as applicable
  - b) Human Resources/People and Culture at Center level
  - c) The Global Director, People and Culture
  - d) The applicable member of the Audit and Finance Committee in circumstances where the report of suspicions of misconduct relate to the Center-specific Director General. Any such reports will be directed to Ethics and Business Conduct for action.
  - e) Internal Audit
  - f) Ethics and Business Conduct in person or by email: [ethics@cgiar.org](mailto:ethics@cgiar.org)
  - g) The whistleblowing hotline operated by a service provider: [www.lighthouse-services.com/cgiar](http://www.lighthouse-services.com/cgiar) an independent channel that accepts both anonymous and identifiable complaints. Reports made through this channel are forwarded for action to Ethics and Business Conduct. The hotline also has the ability for a complainant to ask for updates and to exchange messages with Ethics and Business Conduct (for example, if more information is required in order to investigate), all while maintaining anonymity.
- 4.3. Reports should be made as soon as possible after the relevant event(s) have become known. Reports should be factual and contain as much information as possible to allow for a proper assessment of the nature, extent and urgency of the matter.

- 4.4. All complaints filed must be in good faith. Anyone who files a complaint that is known to be false or malicious, or with a reckless disregard for the truth of the statements made, may be subject to administrative or disciplinary action.

### Protection against Retaliation

- 4.5. CGIAR does not tolerate any form of retaliation. Appropriate measures are in place to protect from reprisal anyone who reports wrongdoings and makes a good faith report on any concerns of wrongdoings or suspicions of violations of CGIAR's rules, policies or procedures or of applicable local laws (hereinafter referred to for the purpose of this Policy as: "suspicions of misconduct"). In addition, interim measures may be put in place per 4.10 below.
- 4.6. CGIAR Staff are expected to report suspicions of misconduct through the above-established channels. CGIAR will extend retaliation protection to an individual who reports their concerns externally only if the external reporting was necessary in order to avoid:
- a) Imminent danger to public interest,
  - b) Substantial damage to CGIAR's operations, or
  - c) Violations of national or international law

And a report was previously made of the same information through the established internal channels, but CGIAR failed to inform the individual of the status of the matter within six months of the report.

### Retaliation Complaints

- 4.7. Individuals who have reasonable grounds to believe that retaliation has been taken against them, or will be taken against them, for having engaged in a protected activity may seek redress by submitting a retaliation complaint to Ethics and Business Conduct.
- 4.8. A retaliation complaint must be submitted as soon as possible and normally no later than six months of the adverse action or decision complained of so that appropriate action may be taken. The submission must include all relevant information and documentation available to support the retaliation complaint.<sup>2</sup>
- 4.9. Ethics and Business Conduct will acknowledge receipt of the retaliation complaints normally within seven working days of receipt and will provide its assessment or feedback on the complaint normally within three calendar months of its submission.

### Interim Measures

- 4.10. Pending the completion of an assessment of the retaliation complaint and without prejudice to its outcome, People and Culture/Human Resources and Ethics and Business

---

<sup>2</sup>Whether an adverse action is retaliatory will depend on whether the action would have been taken for separate and legitimate reasons even in the absence of the protected activity. If not, the action would generally be considered as having been motivated by retaliation.

Conduct may on the basis of a preliminary assessment of the complaint put in place interim measures to protect the complainant while the review is pending, including but not limited to:

- a) Temporary suspension of the implementation of the action reported as retaliatory
  - b) Temporary or definitive transfer in terms of manager, job functions, structure or location, as and if feasible
  - c) Instructions to work remotely for a defined time period
  - d) A request to take annual or special leave
- 4.11. Interim measures may be requested by the complainant in their written submission and must be agreed by CGIAR before they are implemented.

#### Further Redress

- 4.12. The procedures set out in this Policy are without prejudice to the rights of the individual who claims to have suffered retaliation, or the individual who is found to have engaged in retaliation, to appeal or seek redress, as the case may be, through the internal recourse mechanisms applicable to their type of appointment in accordance with the Center-specific personnel policies or the CGIAR Dispute Resolution Policy, as applicable.

### 5. Responsibilities

5.1. **Staff** are required to:

- a) Report any suspicion, allegation or evidence of a possible violation of CGIAR policies or standards, whether they have experienced or witnessed the behavior;
- b) Cooperate with investigations following such a report, while maintaining and respecting confidentiality;
- c) Participate in ethics trainings and supporting Ethics and Business Conduct in awareness-raising campaigns for third parties, project participants, and local communities.

5.2. **Executive Leadership** is required to:

- a) Demonstrate personal compliance with this Policy;
- b) Build and promote an ethical organizational culture and lead by example;
- c) Ensure that all Staff have access to, are familiar with, and know their responsibilities pursuant to this Policy;
- d) Ensure that all members of the Center's leadership team are fully trained and briefed on this Policy and receive support and guidance on its implementation in their operations;
- e) Ensure that all Staff receive regular updates and training about this Policy and its application;
- f) Take decisive action concerning any breach of this Policy as warranted by the circumstances; and
- g) Protect individuals who report suspicions of misconduct in good faith from retaliation.

5.3. **CGIAR Center Boards** are required to:

- a) Champion an ethical organizational culture by actively embracing this Policy, setting the tone, and leading by example;
- b) Ensure that all Staff have access to, are familiar with, and know their

- responsibilities pursuant to this Policy;
- c) Require CGIAR Centers to implement this Policy;
- d) Participate in training on CGIAR governance officials’ obligations for this Policy; and
- e) Provide oversight for compliance with this Policy.

5.4. **Ethics and Business** Conduct is required to:

- a) Be responsible for (or Ensure or Manage or Superintend) the implementation of this Policy;
- b) Ensure a timely acknowledgement of receipt (no later than five days) of a complaint received via the Whistleblowing hotline
- c) Ensure complaints are investigated where appropriate to do so, in line with relevant procedures.

**6. Implementation**

6.1. Following adoption, Ethics and Business Conduct will provide mandatory training on this and other ethics policies.

**7. Waiver from this Policy**

7.1. No waiver from this Policy can be provided.

**8. Document management**

**Management Table**

<b>Accountable Official</b>	<b>Responsible Official</b>	<b>Consulted Parties</b>	
Elwyn Grainger-Jones	Andrew Giddings	CoPs: People and Culture Internal Audit Legal (ongoing)	
<b>Related Documents</b>			
<ul style="list-style-type: none"> <li>• Code of Ethics and Business Conduct</li> <li>• Policy on Protection Against and Prevention of Harassment and Discrimination</li> <li>• Safeguarding Policy – Protection Against and Prevention of Sexual Misconduct, Exploitation and Abuse, and Human Trafficking</li> <li>• Procedure on Handling Reports of Alleged Misconduct</li> </ul>			
<b>Revision History</b>			
<b>Version</b>	<b>Effective Date</b>	<b>Approval</b>	<b>Summary of Changes</b>