

Whistleblower Policy

At coculture, we understand the importance of combating and dismantling power structures that impede our organisation's fair and transparent functioning. Recognising the abuse of hierarchical power, we instituted a robust whistleblower policy.

Whistleblower Profile

As an elected board member without ties that might conflict with this role, PhD candidate Mrs Nisren Habib (she/her) serves as the coculture's whistleblower. She is a respected feminist figure who holds a Master's degree in Gender Studies, specialising in gender equity globally and particularly in conflict zones. Her academic pursuits further extend into intersectional feminist research. Based in Germany, Nisren is affiliated with a feminist non-profit NGO. Her expertise in gender equity and dedication to social justice make her a suitable representative for this role.

Scope of Reporting

The coculture organisation encourages reporting any suspected unlawful behaviour and conduct that violates organisational policies or accepted ethical standards. Reportable misconduct includes but is not limited to:

- **Discrimination and Harassment:** Any unequal treatment based on race, sex, religion, nationality, disability, or age, including any unwelcome behaviour that creates a hostile or offensive environment.
- **Theft and Fraud:** Any unauthorised taking of organisation property or fraudulent financial reporting.
- **Unethical Behavior:** This may include violations of organisational values, codes of conduct, or industry regulations. Examples could be bribery, corruption, or abuse of confidential information.
- **Inappropriate Interactions:** This may include any behaviour that is considered unprofessional or wrong in a workplace setting. Examples could be bullying, intimidation, or any other actions that could disrupt the work environment.

Reporting Procedure

All concerns or reports about illegal and dishonest activities must be promptly directed to our board member, Mrs. Habib. If any accusations are levied against a board member, they will be recused from the deliberations on that particular matter. An independent external party will handle the investigation in scenarios where multiple board members or the entire board is implicated. Response and resolution will be ensured within a specified time frame.

Role Clarification

While Mrs. Habib serves as the primary contact for whistleblowing, her role does not involve investigating the reported activity or determining the necessary corrective measures. The investigations will be handled by a designated internal or external party, depending on the nature of the complaint. Mrs. Habib will connect the reporting party to a competent lawyer, the fees for whom coculture will bear. It's to be noted that these legal fees will align with the standard rates prevalent in Germany.

Responsibility

The whistleblower must act judiciously and cautiously to prevent unnecessary or baseless allegations without being discouraged from raising legitimate concerns. Any person who files a deceptive report will be held accountable. Consequences may encompass a public apology, reimbursement of costs arising from their information, and possible compensation for damages resulting from their actions.

Whistleblower Protection

Our commitment to our whistleblowers is twofold, emphasising confidentiality and protection against retaliation. We strive to preserve the whistleblower's anonymity, but specific investigations, legal obligations, or defence rights may necessitate disclosure. Under no circumstances will coculture retaliate against a whistleblower through unjust employment actions, salary cuts, unfavourable work assignments, or physical threats. However, this protection doesn't grant immunity to whistleblowers from their wrongdoings that might be unearthed during investigations.

How to report

Any employee concerned about suspected misconduct or observed illegal or unethical behaviour should promptly report it to Mrs. Habib, coculture's designated whistleblower. Reports can be made through the following methods:

- Email: Contact Mrs. Nisren Habib directly at whistleblower[at]coculture.de
- Confidential Meeting: Arrange a private meeting with Mrs. Habib if needed.

The whistleblower is responsible for forwarding the report to the appropriate party for further investigation, ensuring confidentiality to the extent possible and by legal requirements.

Staff Training and Understanding of the Policy

To ensure that all employees understand coculture's Whistleblower Policy and their rights and responsibilities under it, the following training and education measures will be implemented:

- Onboarding Training: New employees will receive a copy of the Whistleblower Policy as part of their orientation.
- Accessible Information: The policy will be made available on the organization's internal

website or other accessible locations, and hard copies will be provided upon request.

- Ongoing Education: Regular updates, annual reviews, and open forums for questions will be part of the continuous education process.

Policy Review and Update

The policy will be reviewed annually, and updates will be communicated to all staff members in case of any change or update.

coculture's Whistleblower Policy reflects our unwavering commitment to ethical conduct, accountability, and the principles of justice and transparency that form the cornerstone of our organization. We believe every community member has a vital role in upholding these values. Through our Whistleblower Policy, we invite and empower our team to voice concerns and act as guardians of our shared mission. Together, we create a safe and respectful environment where integrity and honesty shape our collective path toward a better, safer, and fairer world.

Authorized by coculture
CEO Khaled Barakeh

