



## Whistleblowing guidelines for LHL International staff

Whistleblowing is an important safeguard for maintaining a healthy and safe working environment. LHL International (LHLI) is committed to fostering a culture of openness and integrity where concerns can be raised without fear of retaliation.

LHLI is committed to ensuring that all reports are handled responsibly, confidentially, and fairly, and that individuals who raise concerns in good faith are safeguarded from adverse consequences.

These procedures apply to the reporting of concerns within LHLI. Reports relating to partner organisations are subject to a separate procedure.

### Who may report?

All staff are entitled to report concerns. Staff is in this context defined as LHLI employees, executive board members, consultants, volunteers and individuals working under the LHLI name.

Reports of suspected misconduct will be taken seriously regardless of the reporter's position or role.

### Reportable concerns

Objectionable conditions are actions contrary to legal provisions, the Norwegian Working Environment Act, LHLI's written documents on Anti-corruption and Code of Conduct or widely accepted ethical norms in society.

The recipient of the report must often assess whether it constitutes whistleblowing. Is it a suggestion for improvement, or does it concern a matter covered by the duty to report as described in § 2A-3 in the Norwegian Working Environment Act

[https://lovdata.no/dokument/NL/lov/2005-06-17-62/KAPITTEL\\_3#§2a-1?](https://lovdata.no/dokument/NL/lov/2005-06-17-62/KAPITTEL_3#§2a-1?)

Reportable concerns include, but are not limited to

- Threats to life or health
- Suspected financial misconduct or irregularities
- Suspected unlawful favouritism or "nepotism"



- Unsafe or irresponsible working environment
- Breaches of recruitment procedures
- Sexual harassment
- Racism or discrimination
- Unethical conduct while traveling or breaches of the Code of Conduct
- Risks to climate and the environment

## Reporting channels

- Concerns regarding staff: Report to the Director.
- Concerns regarding the Board: Report to the Director.
- Concerns regarding the Director: Report to the Chair of the Board.

## How to report

Reports may be submitted in person, by email, or by phone.

Contact information for the Director is available on the LHLI website. Contact information for the Board is available in the organisation's internal directory.

Reports should be as specific and detailed as possible to enable proper follow-up.

## Confidentiality and Anonymity

Whistleblowers may choose to remain anonymous. However, anonymity may limit the ability of the organisation to investigate thoroughly. Anonymous reports may be submitted, for example, by letter or anonymous email.

The identity of whistleblowers will not be disclosed to employees or third parties unless the whistleblower explicitly consents.

## Handling of reports

- The employer is obliged to follow up on all reports.
- All reports of objectionable conditions will be subject to further investigation.
- The report is confidential, but the reported person has the right to be informed of the allegations within 14 days.
- The privacy of both the whistleblower and the reported person will be protected.
- Feedback will be provided to the whistleblower within 7 days of submission, and subsequently at regular intervals until the matter is concluded.
- Investigations should, where possible, be completed within 6 weeks to enable corrective measures to be implemented promptly.
- Where measures are introduced, the organisation will be informed of the case conclusion.
- Whistleblowers are protected against retaliation under these procedures.