

## Greenpeace Nordic Whistleblower Policy

Policy Category: Nordic Policy

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Policy Owner: Executive Director

Applicability or Scope: All Greenpeace Nordic People

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## Introduction

Greenpeace Nordic (GPN) is committed to maintaining high ethical standards of performance, by fostering an environment where our people can, in good faith, fulfil their duty to disclose malpractice and misconduct detrimental to GPN's mission and values, and by protecting them from retaliation.

This policy applies to all GPN people, including individuals seconded to GPN and acting under the direction of GPI or other NROs.

In theory, any type of complaint can be submitted to the Compliance Officer via the NROs Whistleblowing Procedure, regardless of whether the content of the complaint would sit within the [Integrity System](#) or not. However, the anonymous nature of Whistleblower complaints make it difficult to use this process for Integrity related matters. The Compliance Officer will therefore have the opportunity to offer this advice to the complainant and inform them that their complaint might be better suited to being submitted via the Integrity System.

## Definitions

People and "individuals" are defined as all permanent and temporary salaried staff, interns, volunteers, job applicants and freelancers/contractors under the direction of (deployed by) GPN.

Good faith is defined as when a report is made without malice or consideration of personal benefit and the individual has a reasonable basis to believe that the report is true, provided, however, that a report does not have to be proven to be true to be made in good faith.

Malpractice and misconduct are defined as acts punishable by criminal sanction, including, but not limited to, gross misconduct, assault, sexual harassment, molestation, unlawful breach of privacy, financial fraud. For other concerns and complaints connected to improper behaviour, dishonesty, deliberate wrongdoing including non compliance with policies etc, we refer to our Integrity System.

## Detailed policy statement

GPN requires all of our people to maintain high standards of ethical performance, and to comply with relevant laws and regulations, unless a violation of law and regulation is part of a planned or performed campaign or action connected to Greenpeace's values<sup>1</sup> of bearing witness and non violent direct action. GPN encourages whistleblowers who in good faith raise concerns within the organisation related to misconduct and malpractice detrimental to GPN's mission and values, and commits to investigate these concerns, without threat of retaliatory actions against whistleblowers<sup>2</sup>. In the first instance whistleblowers should raise their concerns to the Chair of the GPN Board (see Handling a violation)<sup>3</sup>.

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<sup>1</sup> <http://www.greenpeace.org/international/en/about/our-core-values/>,  
<http://www.greenpeace.org/sweden/se/om-oss/Varderingar-och-kannetecken/>

<sup>2</sup> Retaliatory actions include, but are not limited to, demotion, suspension, termination, transfer to a lesser position, denial of promotion, denial of benefits, threats, harassment, cancellation of contractual arrangements, or denial of compensation as a result of whistle blowing.

<sup>3</sup> Employment related concerns should be raised as set out in the '[Employee Handbook - GPN Policies & Procedures Manual](#)'.

GPN does not retaliate against whistleblowers who disclose or threaten to disclose concerns to a state regulatory authority<sup>4</sup>, any activity, policy, or practice of GPN that the individual reasonably believes is in violation of a law, or a rule, or regulation mandated pursuant to law.

If a whistleblower does not as a first step raise their concerns to the Chair of the Board, or to a state regulatory authority and instead disclose, or threaten to disclose, concerns related to misconduct and malpractice detrimental to GPN's interests, to persons, entities or other bodies that are external to GPN, for example to social and other media, they are not covered by this policy.

An individual who retaliates against a whistleblower will be subject to disciplinary action. A whistleblower not acting in good faith will also be subject to disciplinary action.

GPN will take all reasonable steps to protect the identity of the whistleblower. No information will be divulged to external authorities, unless required to do so by law, without the permission of the whistleblower.

## Monitoring and documentation

The Chair of the GPN Board is the Whistleblower Policy Compliance Officer (CO). The CO is responsible for investigating all reports of concern made under the auspices of this policy, and can decide (or not) to inform the Executive Director (ED) about ongoing investigations. In the rare case where the whistleblower has reason to believe that the CO and the ED may be compromised by the issue at hand, they may direct the issue directly to the rest of the board.

## Handling a violation

An individual can choose to either file their report verbally, in writing or in a meeting. The first course of action for all is to email the CO (as outlined below) in regards to their concern as soon as possible in connection to the alleged act (or initial awareness of the act).

If filing a written report the report must include the following information, or may be rejected as insufficient:

- Be directed to the CO, at [whistleblower.gpn@greenpeace.org](mailto:whistleblower.gpn@greenpeace.org)
- The name, email address and job title of the whistleblower. A description of the specific actions that constituted the alleged improper activity or condition including, where possible, a list of witnesses and any documentary evidence in support of their report.

If filing a verbal report, the CO will ask for the same information during the phone call or meeting.

The CO will acknowledge receipt of the whistleblower's report by email within 7 days of receipt. The CO will initiate an investigation. This investigation may be conducted by the CO, by an internal designee appointed by the CO, or by external investigator(s) retained by the CO in consultation with the Nordic People & Culture Director.

The investigator(s) can interview the whistleblower and any other individuals they deem relevant to the conduct of a fair investigation. All GPN people are mandated to cooperate with the investigation and to provide honest answers and information. Information collected during

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<sup>4</sup> A state agency that regulates activities in the public interest.

investigation will only be shared on a “need-to-know” basis. The interviews will be completed within 45 days of receipt of the report of concern, unless delayed by good grounds.

The CO will regularly update the whistleblower on the process.

The investigator(s) will forward a written report of their investigation to the CO within 60 days of the filing of the report of concern. The CO will rule on the investigation in writing and forward this ruling, including recommended corrective measures to be taken, to the ED, or if the complaint concerns the ED directly, to the rest of the board of directors. The ruling will also be forwarded to the whistleblower, edited to protect confidentiality and private information of individuals, within 10 working days of receipt of the investigators report.

After receipt of the CO’s report/ruling, the ED will take appropriate corrective measures to remedy the issue(s). The ED will update the CO every 30 days until corrective measures have been implemented.

At each meeting of the Board of Directors of GPN, information will be provided on any whistleblowing activities. The CO will, however, bring to the Board’s attention whistleblowing activities arising between Board meetings if they feel it should be brought to the Board’s attention in a more timely manner.

On an annual basis the ED will give to the Works Councils, and the CO will give to the Board of Directors of GPN, the CO’s reports on whistleblower reports of concern and the corrective measures taken by the ED, edited to protect the identity of all individuals.

### Validity and revision status

This policy will be reviewed biannually.

Revision history: 2022-11, Revised policy. 2012-04, New policy