

Information for Whistle Blower System

Who can make a report?

To be able to report to us according to the Whistleblowing Act, and receive the protection that the Act provides, you must have received or obtained information about the misconduct in a work-related context.

It can be as an employee, job seeker, consultant, volunteer, or intern. Even individuals in the organization's management can also report misconduct through the whistleblower function.

Whistleblower Policy

This whistleblower policy has been developed in accordance with the EU Whistleblower Directive and the *Whistleblower Act (Law 2021:890)*, as well as industry best practices.

The policy applies to all employees, including staff, volunteers, interns, and anyone who contributes to the work of Children's Mission or our partner organizations, as well as stakeholders affected by our activities.

Why does Children's Mission have a whistleblower function?

Children's Mission has a whistleblower function to provide an opportunity to report serious misconduct. The purpose is to establish an open and secure channel for those who suspect or know about a misconduct. This aims to quickly uncover suspicions, increase public trust, and enhance Children's Mission credibility both internally and externally.

Whistleblowing, Definition

Whistleblowing refers to someone within or outside the organization who raises the alarm about an occurrence, potential occurrence, or past occurrence of serious misconduct within the organization or in partner organizations that may cause harm to the organization. It also implies that there should be a public interest in bringing this information to light. In practice, this means that incidents or matters violating Swedish law, EU law, as well as laws in our operational countries, can always be reported without the risk of reprisals, as well as issues of interest to a broader audience.

There should also be a legitimate interest in disclosing the information. If a whistleblower report is made, the individual is entitled to protection under the *Whistleblower Act (Law 2021:890)*, given certain conditions. The law prohibits employers from any retaliations against those who report misconduct. If an employer does take such action, they may be liable for damages.

The whistleblower function does not include bullying, alcohol or drug problems, less serious work environment problems, or other related issues must be reported and handled via Children's Mission regular reporting channels.

What can be reported?

A whistleblower function is intended to handle suspicions of serious misconduct of public interest related to:

- Actions that violate applicable legislation, such as fraud or other financial irregularities.
- Misuse of the organization's funds.
- Failure to comply with an established organizational policy.
- A work-related context in which there is a public interest in disclosure or serious misconduct related to:
 - Financial services, products, and markets, and preventing money laundering and the financing of terrorism
 - Transport safety
 - Environmental protection
 - Public health
 - Consumer protection
 - Protection of privacy and personal data, as well as security in network and information systems.

This is not an extensive list but merely provides examples of types of behaviours that may warrant a report.

The information received may contain sensitive personal data. Applicable legislation contains rules regarding how such privacy and sensitive personal data may be handled. Processing data requires compelling reasons. If such compelling reasons do not exist, the personal data may not be retained.

Who should you report to?

Whistleblowing can occur in writing or verbally, but it is advisable to do so via Children's Mission website, where reports can also be made anonymously. The contact persons within Children Mission are two members of the board appointed for this purpose. If the incident involves a partner organization in Africa, a board member from our regional office, Children's Mission Africa, will also be contacted.

For the process following the receipt of a potential report, see Appendix 1.

Protection

This whistleblower policy protects employees from reprisals if the person disclosing a misconduct:

- Reveals the information in good faith

- Believes that it is primarily true
- Does not act with malicious intent or make false accusations
- Does not seek personal or financial gain

Policy adopted by the board on May 25, 2024.

Process (Appendix 1)

Process under the Whistleblower Act

1. Report from Whistleblower Received

2. Assessment of the Case

Upon receiving a report, an assessment is made to determine whether it is of a nature that can or should be handled further through the whistleblower function. If the case cannot be handled within the whistleblower function, the whistleblower is encouraged to raise the matter through Children's Mission regular reporting channels.

3. Action Plan

The Secretary-General is informed verbally of the incoming report and the possibilities to investigate the case is based on the estimated time required, measures and scenarios.

4. Feedback to the Whistleblower (if the reporter has chosen to provide their name and contact information)

Within 7 working days of receiving the report, a designated person within the management must communicate back to the whistleblower with the following information:

- Confirmation that the report has been received
- Indication of how the case will be handled
- Give an estimate of how long it will take to reach a final resolution
- Notify whether investigations will be conducted or not, along with the reasons for this.

5. Investigation of the Case

Continued dialogue between the investigator and the whistleblower (if the report was not made anonymously), while additional information is gathered through interviews and internal documentation.

6. Quality Assurance and Review

A person with expertise in the matter reviews the case, advises on actions to be taken and prepares the conclusions. Any follow-up questions arising from the case are directed to the whistleblower (if the report was not made anonymously).

7. Investigation Report

A written investigation report is prepared. The management team decides the process for further handling of the case. In connection with this, the investigator also provides feedback to the whistleblower regarding the status (if the report was not made anonymously).

Information in the Report

The report should include the following information:

- The type of misconduct being reported.
- Where the incident/s have taken place.
- When the incident/s occurred (preferably with dates and times, and whether they are recurring).
- Who is involved (preferably names and roles).
- Documentation in any form if you have access to it, or information about where documentation that may be of interest can be found.
- Information on whether you have taken any other actions due to the misconduct.

Documentation and Storage

Information contained in the reports must be deleted no later than two years after the case has been closed. It is also important to document what emerges during verbal reporting, if the whistleblower consents. Storage is also adjusted to comply with other applicable regulations, such as **General Data Protection Regulation (GDPR)**.

Malmö, September 23, 2024.