

WHISTLEBLOWING POLICY

It is important to our organisation that any fraud, misconduct or wrongdoing is reported and properly dealt with. This policy sets out the way in which individuals may raise any concerns that they have and how those concerns will be dealt with.

All of us at one time or another have a concern about what is happening at work. Usually these are easily resolved. However, when the concern feels serious because it is about, for example, a possible fraud, sexual harassment, danger or malpractice that might affect others or the PRI itself, it can be difficult to know what to do. Please remember that there is plenty of advice available to you on SharePoint that may also be of assistance in these matters, including the Employee Handbook and the Human Rights Policy.

The Board of Directors is also covered by this policy and you may also want to refer to the [Board of Directors Terms of Reference](#) and the [Ethics Policy](#).

Possible issues to raise under this policy might include (but are not limited to), suspicion of a member of staff taking a bribe, a contractor endangering the health and safety of staff and visitors or suspicions of fraudulent activity. Examples of issues more appropriately addressed through the Grievance or Bullying and Harassment policies might include (but are not limited to) your day to day working conditions or concerns about your relationship with your manager. For a more exhaustive list, see this [resource](#) for detail.

You may be worried about raising such a concern and may think it best to keep it to yourself, perhaps feeling it's none of your business or that it's only a suspicion. You may feel that raising the matter would be disloyal to colleagues, your manager or to the PRI. You may decide to say something but find that you are unsure what to do next.

The PRI Board and CEO are committed to leading our organisation in line with the highest ethical standards. We have introduced this policy to reassure you that it is safe and acceptable to speak up and to enable you to raise any concern you may have about malpractice at an early stage and in the right way. Rather than wait for proof, we would prefer you to raise the matter when it is just a concern. In fact, we would like you to think of it as your duty to flag any behaviours that go against our policies and practices.

This policy applies to all those who work for us. In the event that this policy contradicts with local regulations, local statutory requirements will then apply.

OUR COMMITMENT

YOUR PROTECTION

The PRI is committed to this policy, as part of our broader approach under our Human Rights Policy. Provided you are raising a genuine concern, it does not matter if you are mistaken.

Convention no. 158 of the International Labor Organization (ILO) on Termination of Employment is a universal international agreement which provides an express protection to whistleblowers against reprisals from an employer. We will not tolerate the harassment or victimisation of anyone raising a genuine concern and we consider it a disciplinary matter should someone who has raised a genuine concern be victimised.

Please be aware that if you raise a malicious claim this will result in action under the Disciplinary Policy. Using this policy for malicious intent will not be tolerated.

YOUR CONFIDENCE

With these assurances, we hope you will raise your concern openly. We recognise that there may be circumstances when you would prefer to speak to someone confidentially first, so please just let us know if this is the case. If you ask us not to disclose your identity, we will not do so without your consent unless required to do so by law. In cases where we are unable to resolve a concern without revealing your identity, for example where your personal evidence is essential, we will discuss with you how the matter can best proceed. For information on fully anonymous reporting routes, please see below under “Step Three”.

We would encourage you to raise your concerns openly and where anonymous concerns are made we will always do our best to address them. However, please be aware that it can be much more difficult to fully address and investigate anonymous concerns hence why would always encourage open dialogue. If you want feedback on an anonymous complaint you will need to speak with the individuals named below on a confidential basis. They will ask you if you want the matter to be addressed confidentially or not.

HOW TO RAISE A CONCERN

Please remember that you do not need to have firm evidence of malpractice before raising a concern. We do ask that you explain as fully as you can the information or circumstances that gave rise to your concern.

STEP ONE

If you have a concern about malpractice, we hope you will feel able to raise it first with your line manager. This may be done verbally or in writing.

STEP TWO

If you feel unable to raise the matter with your manager, for whatever reason, please raise the concern with:

Chief People and Culture Officer	lian.hillier@unpri.org	+44 20 3714 3230
Director Governance, Risk and Compliance	christopher.sperling@unpri.org	+44 20 3714 3148

These people have been given special responsibility and training in dealing with whistleblowing.

These individuals will ask you if you want to raise the matter confidentially, so that appropriate arrangements can be made.

STEP THREE

If these channels have been followed and you still have concerns, or if you feel that the matter is so serious that you cannot discuss it with any of the above internal members of staff, please contact our independent representative on the Board of Directors:

Wilhelm Mohn, member of the People & Culture Committee whm@nbim.no

You can also speak confidentially to our third party provider Protect on 020 3117 2520 or by email at whistle@protect-advice.org.uk. Their Advisers can talk you through your options and help you raise a concern, either with the PRI or a relevant regulator.

HOW YOUR CONCERNS WILL BE HANDLED

We will acknowledge receipt of your concern within two working days. We will assess it and consider what action may be appropriate. This may involve an informal review, an internal inquiry or a more formal investigation. We will tell you who will be handling the matter, how you can contact them, and what further assistance we may need from you. During the process we will ensure to summarise your concern detailing the proposed next steps, if we have misunderstood the concern or there is any information missing please let us know.

When you raise the concern it will be helpful to know how you think the matter might best be resolved. If you have any personal interest in the matter, we do ask that you tell us at the outset. If we think your concern falls more properly within our grievance, bullying and harassment or other relevant procedure, we will support you through this process.

Whenever possible, we will give you feedback on the outcome of any investigation. Please note, however, that we may not be able to tell you about the precise actions we take where this would infringe a duty of confidentiality we owe to another person.

While we cannot guarantee that we will respond to all matters in the way that you may wish, we will aim to handle it fairly and properly. By using this policy you will help us to achieve this.

If at any stage you experience reprisal, harassment or victimisation for raising a genuine concern please speak to your line manager or the People Team.

Version No.	Approved by	Owner	Approved by date	Date last updated	Review date	Review frequency	Next review date
1.03	PRI Board	Director Governance, Risk and Compliance	June 2023	February 2024	February 2024	Every two years	June 2025

INDEPENDENT ADVICE

If you are unsure whether to use this policy or you want confidential advice at any stage, you may contact our third-party provider, Protect on 020 3117 2520 or by email at whistle@protect-advice.org.uk. Their lawyers can talk you through your options and help you raise a concern about malpractice at work. They can also advise you on appropriate regulatory or independent bodies to speak to about the matter.

EXTERNAL CONTACTS

While we hope this policy gives you the reassurance you need to raise your concern internally with us, we recognise that there may be circumstances where you can properly report a concern to an outside body. We would rather you raised a matter with the appropriate regulator – such as the Health and Safety Executive - than not at all. Public Concern at Work (see above for contact details) will be able to advise you on such an option, if you wish.

PRI Association

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United Nations
Global Compact

An investor initiative in partnership with UNEP Finance Initiative and UN Global Compact