

**“APPROVED”
by the Minutes № 1
of the Meeting
of the Supervisory Board of the
CO “CF “ADRA UKRAINE”
dated 5th of June 2025**



**Whistleblowing Policy of
CO “CF “ADRA Ukraine”**

Kyiv, 2025

Definitions

Whistleblower: A whistleblower is a person who comes forward and shares their knowledge of any misconduct they believe is taking place within the network, office, or specific activities of the CO “CF “ADRA UKRAINE”. A whistleblower may be an employee, contractor, supplier, or any other individual who becomes aware of any unlawful activity.

Reporting: The intentional and voluntary disclosure of misconduct by employees of the CO “CF “ADRA UKRAINE” or by individuals for whose actions ADRA may bear responsibility (e.g. misconduct by a volunteer, partner, or supplier). Disclosure or attempted disclosure may be made by any interested party within or outside the network and may be anonymous. Disclosure may occur through access to data, events, files, or any other information related to actual, suspected, or anticipated unlawful actions within the CO “CF “ADRA UKRAINE”.

Examples of Reportable Violations: Concerns that may pose a serious threat to the health or safety of individuals, as well as any unlawful departmental or organisational practices, including any failure to comply with legal provisions that affect or may endanger staff, beneficiaries, donors, the image and/or reputation of the CO “CF “ADRA UKRAINE”.

These concerns may include the following:

- A criminal offence or unlawful activity (including fraud and corrupt behaviour such as theft or embezzlement);
- An incident involving the protection of child rights;
- Sexual exploitation, sexual abuse or sexual harassment;
- A miscarriage of justice;
- Any act that endangers human health, safety, or the environment (excluding risks that are ordinarily part of an employee’s work);
- Gross mismanagement, including the mismanagement of public funds or public assets (state-owned property);
- Knowingly directing or advising someone to carry out any of the unlawful acts listed above;
- Breach of any other legal obligation;
- Concealment of any of the above;
- Any attempt to prevent a person from expressing their concerns

Purpose

This Policy has been adopted to ensure that anyone can report violations that may negatively impact the CO “CF “ADRA UKRAINE”, its beneficiaries, donors, and other stakeholders without fear of retaliation or adverse consequences for their work or employment status within the CO “CF “ADRA UKRAINE”.

The intention of the CO “CF “ADRA UKRAINE” through this Policy is to provide a safe environment for reporting misconduct, free from fear of reprisal, and to give individuals confidence that their concerns regarding wrongdoing will be properly addressed and resolved in a timely manner.

What This Policy Is NOT Intended For:

Addressing general complaints related to workplace conduct, interpersonal issues, or other matters not linked to safety or misconduct violations. General complaints should be submitted to line managers or through other mechanisms outlined in the CO “CF “ADRA UKRAINE” Office Personnel Management Manual or the Feedback and Complaints Response Mechanism Policy;

- Resolving general complaints from beneficiaries regarding project activities or staff behaviour (such complaints should be submitted through the relevant localised complaints and response mechanisms).
- This Policy may not be used to appeal the official results in accordance with other policies of the CO “CF “ADRA UKRAINE”.

Scope

As an approved policy of the ADRA office network, this Whistleblower Policy applies to:

- ADRA International and all regional offices of the CO “CF “ADRA UKRAINE”, including country representations, field offices, and any project implementation sites;
- All offices that seek to comply with ADRA accreditation and licensing standards;
- All other organisations that agree to adhere to the policies of the CO “CF “ADRA UKRAINE”;
- All permanent, temporary, and part-time staff; members of governing bodies; interns; volunteers; ADRA visitors (including media representatives); contractors and consultants; and sub-grantees (local implementing partners and service providers), all of whom must comply with the Safeguarding Policy. In this Policy, this group is collectively referred to as “representatives of the CO “CF “ADRA UKRAINE”.”

This Policy shall automatically apply in the same country and all regions where the regional office of the CO “CF “ADRA UKRAINE” funds projects.

All organisations within the ADRA network may implement their own procedures, provided these comply with this and other ADRA network policies. The CO “CF “ADRA UKRAINE” will comply with laws and regulations that prohibit misconduct, but if this Policy exceeds any legal requirements, the CO “CF “ADRA UKRAINE” will comply with the standards of this Policy to the extent permitted by the applicable legislation of Ukraine. Where required by law or local practice, ADRA offices may enhance the standards and requirements set forth in this Policy, but may not alter the Policy itself.

General Information

The CO “CF “ADRA UKRAINE” is committed to honesty and ethical behaviour in the workplace and will promote and maintain an environment where its representatives can work safely and properly without fear of retaliation. The CO “CF “ADRA UKRAINE” encourages whistleblowing and provides a mechanism through which genuine concerns can be reported confidentially (without misuse or defamation by the whistleblower). All representatives of the CO “CF “ADRA UKRAINE” are obliged to report any violations of the policies and procedures of the CO “CF “ADRA UKRAINE”.

The CO “CF “ADRA UKRAINE” will take measures objectively and appropriately to resolve all reports of alleged misconduct — without retaliation against whistleblowers. In addition, the CO “CF “ADRA UKRAINE” will work to ensure that the whistleblower is protected from retaliation and other harmful treatment by interested parties.

If the disclosure of information may affect the physical or emotional safety or well-being of a person, the CO “CF “ADRA UKRAINE” will endeavour to provide timely referrals for medical and/or psychosocial support and will endeavour to ensure their safety and security.

It is a violation of the Whistleblowing Policy for someone who has filed a knowingly false whistleblowing complaint or provided knowingly false information in a complaint. This will lead to disciplinary action if possible (if the complainant is an employee or other representative of the CO “CF “ADRA UKRAINE”).

Principles

The values of the CO “CF “ADRA UKRAINE” are related to the Principles of the CO “CF “ADRA UKRAINE”, which form the basis of this Policy. These values and principles guide the implementation of the Whistleblower Policy through additional principles:

Liability of the CO “CF “ADRA Ukraine”: for the actions of its employees, volunteers, suppliers and partners;

Fairness: regarding how representatives of the CO “CF “ADRA Ukraine” treat each other, as well as in the process of reporting and investigating a violation or event;

Openness and Transparency: The CO “CF “ADRA Ukraine” strives to be open and transparent. This Policy ensures that all employees and volunteers are empowered to report any suspected violations;

Protection: for whistleblowers from dismissal, victimisation (the process or end result of becoming a victim of a criminal attack) or retaliation after disclosing information.

Confidentiality: the identification of whistleblowers and other persons involved in the disclosure process, as well as the confidentiality of any information collected, will be protected to the fullest extent possible.

Implementation

The CO “CF “ADRA Ukraine” is fully responsible for this Policy.

The President or Chief Executive Officer is ultimately responsible for the implementation of this Policy, which includes the distribution, training and communication of this Policy to all offices. They also have a responsibility to ensure that all complaints in their country or region are properly reported and that those who report wrongdoing are not retaliated against. Senior leadership must ensure that all staff, volunteers, suppliers, consultants, and partners, as well as affected communities with whom the CO “CF “ADRA Ukraine” interacts, are made aware of this Whistleblower Policy.

The Human Resources Department must retain a signed copy of the acknowledgement of this Policy in the personnel file of each employee of the CO “CF “ADRA Ukraine”.

Whistleblowing Mechanisms

When to Report and When Not To

If you become aware of, or have reasonable grounds to believe that misconduct has occurred, is occurring, or may occur, you should first report it to your line manager or the appropriate designated person responsible for such matters. If you have already done so and believe that the concern was not taken seriously, or if you feel unable to use these channels, you may proceed to report it through other available mechanisms.

If you sincerely believe that you have discovered or witnessed evidence indicating abuse, fraud, negligence, or any other violation of the Code of Conduct—or anything that may constitute a criminal act within the organisation—you are obliged to report it. Concerns may be raised verbally or in writing and should include full details and, where possible, supporting evidence. Confidentiality will be maintained unless the complainant explicitly consents to having their identity disclosed. The identity of the whistleblower must remain confidential to the greatest extent possible, as should any communication involving employees of the CO “CF “ADRA Ukraine” mentioned in or related to the report.

Reporting Misconduct Through Established Internal Mechanisms

Reports of misconduct should be submitted through established internal mechanisms and in accordance with the procedures outlined by designated national offices. Depending on the nature of the allegation, this may include:

- Immediate supervisors, the Human Resources Director, department head, local council representative, or the designated regional focal point;
- A designated individual within the country office, such as a complaints handling specialist or protection coordinator, assigned to receive confidential reports;
- Response mechanisms at the country level:

- Filing a complaint by e-mail: Protection@adra.ua;
 - Online form (may be anonymous) to be filled in on the website: <https://www.adra.ua/special-complaint/>;
 - Telephone support lines: **0 800 20 13 30**;
 - Personal appeal to the person responsible for gender equality: Contact **the Protection Specialist** (by calling the hotline, where the operator will transfer the call to a specialised specialist)
- Security office at ADRA International Protection@adra.org

Mechanisms for Reporting Violations

a. Reporting misconduct through established internal mechanisms.

For those who confidentially report information exposing misconduct, a sample template useful for complaint investigation is provided in Annex II. Complainants within the organisation can also use the reporting mechanisms described in ADRA's Global Procedures to receive and report sensitive complaints.

b. Reporting violations through the General Conference of the Seventh-day Adventist Church:

Individuals can file ADRA-related complaints anonymously through the Seventh-day Adventist Church's disclosure mechanism. The Seventh-day Adventist Church uses the website Silent Whistle. Complaints submitted against ADRA via Silent Whistle are received by the Office of General Counsel at the General Conference of Seventh-day Adventists and forwarded to the appropriate person at ADRA International or its Board. The Office of the General Counsel can communicate with a complainant via Silent Whistle, regardless of whether the complaint was filed anonymously or not. The instructions for using the Silent Whistle platform are as follows:

1. Connect to the Internet from a computer outside your workplace.
2. Insert "Adventist.Alertline.com/GCS/Welcome" into the address bar and press Enter.
3. Click on "Report a Concern" or "Follow Up on a Reported Concern", depending on your needs
4. Follow the on-screen instructions to submit your complaint

c. Reporting misconduct through external mechanisms:

Protection against retaliation will be extended to a person who reports misconduct to a legal entity or individual outside of the established internal mechanisms if you believe that the internal mechanisms are not appropriate and you can instead raise your concerns with an external organisation, such as a regulator. Of course, you can do so provided you have sufficient evidence to support your concerns.

d. Reporting misconduct through external mechanisms:

ADRA will not require its employees to sign or abide by internal agreements or confidentiality statements that prohibit or otherwise restrict personnel from lawfully reporting waste, fraud or abuse to a designated investigator or law enforcement representative of the department or agency authorised to receive such information. The CO "CF "ADRA Ukraine" strongly encourages you to seek advice from Public Concern at Work before reporting your concerns⁵.

Note on Anonymous Disclosure and Confidentiality

A proper investigation may be more difficult or even impossible without direct access to the person who originally raised the concern. It is recommended that you disclose your identity if possible. The more information you can provide, the easier it will be for the CO “CF “ADRA Ukraine” to advance this investigation.

If you choose to make a verbal disclosure and remain anonymous, the CO “CF “ADRA Ukraine” will take reasonable steps to protect your identity; however, anonymity cannot be guaranteed—especially in situations where you may be required to act as a witness (for example, if your report becomes part of a criminal investigation). If such a situation arises, the CO “CF “ADRA Ukraine” will attempt to discuss the matter with you as early as possible.

Nevertheless, the CO “CF “ADRA Ukraine” will investigate all concerns raised, even if they are made anonymously.

Receipt and Referral of Disclosed Information on Misconduct

A whistleblower may report misconduct as part of their reporting duties to their supervisor or a designated person within their office, in order to raise serious concerns in a manner that preserves confidentiality, if desired. The person receiving the complaint guarantees that a written notification of the disclosure of whistleblower information will be sent to the President of the CO “CF “ADRA Ukraine”.

- A. If the primary recipient of the complaint is not at ADRA International, they must determine whether, where, and when the complaint should be referred further, based on the **Risk Assessment Code** provided below.

Risk Assessment Code	Timelines and Points of Contact for Whistleblower Reports and Complaint Reviews
Catastrophic Represents an immediate danger to life, health, property, or infrastructure and requires emergency correction or mitigation to reduce the risk level. Any allegations of child abuse or sexual exploitation and violence related to a representative of the CO “CF “ADRA Ukraine”	Notify ADRA International, your regional office and any ADRA office involved in the incident within 24 hours

Critical Poses a high level of threat to life, health, property or infrastructure and requires hazard correction or control of the incident site within a week. Notify the regional office and any other office of the hazard to reduce the risk as soon as possible	
Significant Represents a medium level of risk to life, health, property, or infrastructure, with a planned and completed corrective response or mitigation to a lower risk level	Notify the regional office and any other office of the CO “CF “ADRA Ukraine” that has contact with the place of the incident within 2 weeks
Minor Represents a low level of risk, with planned and completed mitigation or risk already reduced to a lower level	Within 3 weeks, notify the Security Coordination Centre (e.g. complaints handling specialist or equivalent), and/or the President of the CO “CF “ADRA Ukraine”, and/or members of the Administrative Board

Note: The RAC (Risk Assessment Code) is further explained in Annex III.

- B. If an official disclosure has been submitted to ADRA International or through Silent Whistle, the person who initially received the information must:
1. Forward the complaint to the appropriate person responsible for handling complaints or designated body within 48 hours of receipt;
 2. Acknowledge receipt of the complaint in writing within 5 working days (if the identity and contact details are provided but not disclosed through Silent Whistle).
 3. The responsible person must determine whether the investigation warrants disclosure within 10 working days of receiving the complaint and communicate this decision in writing to the person who made the disclosure. In the case of anonymous disclosures, the responsible person must comply with the same deadline from the date of receipt of the official disclosure.
 4. If the assessment of the whistleblower disclosure indicates a need for an investigation, the responsible person shall appoint an individual to lead the investigation (hereinafter referred to as the investigation team).
- C) If a formal disclosure has been made by ADRA International or through Silent Whistleblowing, the person who originally received the information:
5. If the reported activity falls outside the scope of this Policy, the responsible person should report it to their governance committee (e.g. ADCOM), which will refer it to the appropriate authority (e.g. the police).

Investigating Whistleblower Disclosures

All offices and employees of the CO “CF “ADRA Ukraine” are obliged to cooperate with the investigation and provide access to all records and documents requested by the investigation team⁶. Every employee who is engaged to assist in an investigation is obliged to maintain the confidentiality of the investigation and the information provided.

The CO “CF “ADRA Ukraine” strives to inform the whistleblower about the progress of the investigation and its likely timeframe, whenever appropriate and relevant. Any information provided to a whistleblower about an investigation will be treated as confidential. Specific investigation procedures will vary depending on the nature of the complaint.

Upon completion of the investigation, the investigation team will provide a final written report to the relevant person and/or the investigating committee within 90 days, setting out the results of the investigation and recommending any action to be taken.

- The investigation report will likely include the evidence collected, be anonymised to protect witnesses who will have an opportunity to respond during the investigation, and include the subject matter of the complaint in the allegations.
- Investigation reports (edition is permitted) of substantiated allegations against individuals who may pose a threat to the organisation’s network must be transmitted electronically to ADRA International. Copies of the investigation reports will be kept in electronic form indefinitely in the institutions that received the complaint and ordered the investigation. Copies of the investigation reports will also be included in the relevant employee files. The relevant individuals and/or the Investigation Committee will advocate for specific proposed actions and ensure that they are implemented. They will also consider and act on the basis of an organised study of violations. If possible, they will also inform relevant internal stakeholders and external bodies.

ADRA International reserves the right to inform internal and external stakeholders (e.g. donors, Seventh-day Adventist Church in the region) of ADRA offices that do not follow the investigation process and/or do not comply with the findings and recommendations. In addition, it may lead to the removal of the ADRA accreditation licence (AAL).

Although the CO “CF “ADRA Ukraine” cannot guarantee that it will respond to disclosures in the manner that the complainant may wish, the CO “CF “ADRA Ukraine” will endeavour to deal with the matter in a fair and appropriate manner. If the complainants are dissatisfied with the outcome of the investigation or the way the investigation is conducted, the CO “CF “ADRA Ukraine” prefers that the complainants submit another report explaining why. Concerns will be re-investigated if there are valid reasons to do so.

Protection Against Retaliation

- A. All employees of the CO “CF “ADRA Ukraine” are obliged to report any violation of the policies and procedures of the CO “CF “ADRA Ukraine” to the officials who are responsible for taking appropriate action. A person who submits such a report in good faith has the right to protection from retaliation.
- B. The staff of the CO “CF “ADRA Ukraine” and local councils are obliged to properly facilitate the work of authorised audits, investigations and other supervisory activities. A person who does so has the right to protection from retaliation.
- C. If a representative of the CO “CF “ADRA Ukraine” (including Board members) attempts to prevent an individual from making a confidential report or victimises that individual for raising concerns, the CO “CF “ADRA Ukraine” will treat this as a serious disciplinary offence and may result in dismissal for cause, which will be investigated in accordance with investigations and disciplinary procedures of the CO “CF “ADRA Ukraine” or as appropriate to the particular organisation.
- D. Retaliation against persons who have reported or provided information about misconduct or who have cooperated with an audit, investigation or other supervisory activity is prohibited.
- E. Such behaviour violates the fundamental obligation of all employees and the Board to maintain the highest standards of efficiency, competence and integrity in performing their functions and regulating their behaviour in the best interests of the CO “CF “ADRA Ukraine”.
- F. Retaliation against third parties is prohibited. Any retaliation (including threats) against the contractor or its employees or any other person cooperating with the CO “CF “ADRA Ukraine” because such person has reported misconduct by the CO “CF “ADRA Ukraine” employees will be considered a violation that, if established, will lead to administrative and/or disciplinary measures.

Notification of Retaliation

Individuals who believe that they have been retaliated against because they have reported misconduct or properly cooperated with authorised audits, investigations or other supervisory activities should provide all information and documentation available to them to ADRA International to support their complaint.

Similarly, if someone in the organisation has asked you to edit your complaint or tried to prevent you from reporting, please contact an ADRA International administrator. You can report in the language of your choice; ADRA International will manage the necessary translations. This must be done immediately and, in any event, no later than 6 months after the alleged act or threat of retaliation has occurred.

Contact Information of ADRA International

Email: Protection@adra.org

Telephone [+1 800-424-2372](tel:+18004242372) (toll-free in the United States)

ADRA International

12501 Old Columbia Pike

Silver Spring, MD 20904, USA

The role of the ADRA International administrator in protecting against retaliation for reporting misconduct is as follows:

1. Receive complaints of retaliation;
2. Keep confidential records of all such complaints;
3. Conduct an initial review of the complaint if:
 - The complainant was engaged in security activities;
 - The act of alleged revenge or threat of revenge took place;
 - On the face of it, there is an indication that security-related activity may have been a contributing factor in actions that are likely retaliatory or suggest a threat of retaliation.
4. If necessary, the complaint shall be forwarded to the appropriate person

Once the relevant person receives a complaint of retaliation, the following steps should be taken:

1. If it is possible to contact the complainant, the relevant person will send an acknowledgement of the complaint immediately upon receipt of the complaint.
2. The relevant person must complete the initial review within 30 days of receiving the retaliation complaint. If, in the opinion of the relevant person (or the Chairman of the Board), there is a credible case of retaliation or threat of retaliation, the case will be recommended for investigation by the relevant management body and will immediately notify the complainant in writing that the case has been referred.
 - a. If the relevant person does not formally address the complaint within 30 days, the employee may refer the matter in writing to the President of ADRA International.
6. If, after the relevant person has made a final determination on the matter referred to them by the employee, the employee wishes to have the matter considered further, they may contact the Chairman of the Board in writing. The Chair of the Board may conduct their own independent review of the matter and report to the President of ADRA International.
3. Pending the outcome of the review, the investigator may recommend to the President or other senior member of ADRA International that appropriate action be taken to protect the interests of the complainant, including, but not limited to, the temporary suspension of the retaliatory action reported and, in consultation with the complainant, the temporary reassignment of the complainant or authorisation of a special leave of absence with full pay.
4. ADRA International will endeavour to complete the investigation and submit a report to the relevant person(s) within 45 days. Upon completion of the investigation report, the appropriate person will jointly review and notify the complainant in writing of the results of the investigation and provide the President with their recommendations on the case. Such recommendations may include disciplinary measures to be taken against the perpetrator.
5. If the relevant person determines that there are no credible instances of retaliation or threats of retaliation, but finds that there is an interpersonal problem in a particular office, the relevant person will inform the complainant of the existence of alternative conflict resolution mechanisms in ADRA.
6. If, in the opinion of the person concerned and/or the complainant, a conflict of interest may arise for the individual or legal entity conducting the investigation, it is recommended that the complaint be referred to an external investigative mechanism.