



Whistleblowing Guidelines

1. Purpose

The purpose of these Whistleblowing Guidelines is to foster a culture of transparency, integrity, and accountability within CMC-Nepal. These guidelines are intended to encourage and empower all individuals associated with CMC-Nepal—including employees, volunteers, interns, consultants, partner organizations, and any other stakeholders—to raise concerns about suspected wrongdoing, unethical behavior, illegal acts, or practices that compromise health, safety, human dignity, or organizational integrity.

CMC-Nepal believes that everyone should feel safe and supported in speaking up when they witness or suspect misconduct, without fear of retaliation, discrimination, or victimization. Whistleblowing serves as an early warning mechanism that helps CMC-Nepal identify and address problems before they escalate into more serious issues.

These guidelines aim to:

- Provide a clear and safe process for reporting concerns.
- Ensure that all reports made in good faith are taken seriously, treated confidentially, and investigated promptly and fairly.
- Reassure whistleblowers that they will be protected from retaliation or adverse consequences for reporting concerns responsibly.
- Uphold the values of good governance, ethical conduct, and compliance with legal and organizational standards.

By establishing these guidelines, CMC-Nepal reinforces its commitment to ethical practices, safeguarding of rights, and the creation of a respectful, inclusive, and accountable working environment.

2. Scope

These Whistleblowing Guidelines apply to **all individuals and entities that are associated directly or indirectly to CMC-Nepal**, regardless of their role, level of seniority, duration of association, or location. These guidelines are applicable in all contexts where individuals are acting on behalf of, representing, or working with CMC-Nepal—whether in offices, working areas of CMC-Nepal, online environments, or during travel and external events.

This includes, but is not limited to:

- **Permanent and contract employees** working at any level or department or division within CMC-Nepal.
- **Interns and trainees** engaged in short-term or project-based assignments.
- **Volunteers** contributing their time and effort, whether regularly or occasionally.
- **Consultants, advisors, and service providers** engaged by CMC-Nepal through formal or informal agreements.
- **Partner organizations**, implementing agencies, and third-party collaborators.
- **Board members and Executive Leadership.**
- **Donors, beneficiaries, and community stakeholders** who are engaged with CMC-Nepal's programs or personnels.

Furthermore, the guidelines are relevant to all types of misconduct, including incidents that may occur:

- Within the workplace or project areas
- During field visits or community outreach activities
- In virtual or online communications related to work
- At external locations where official duties are performed (e.g., workshops, conferences, trainings)

This wide scope ensures that the whistleblowing mechanism remains inclusive, accessible, and protective for all who are part of or impacted by CMC-Nepal's work. By applying these guidelines broadly, CMC-Nepal aims to build a culture of trust, safety, and accountability across all layers of the organization and its extended partnerships.

3. What Can Be Reported?

CMC-Nepal encourages all individuals associated with the organization to promptly report any concerns, suspicions, or firsthand knowledge of behavior or actions that may compromise the integrity, safety, or ethical standards of the organization. Concerns may involve individuals at any level of the organization and may relate to incidents that have occurred, are currently happening, or are likely to happen.

The following are examples of issues that **should be reported** under these guidelines:

- a) **Fraud, Corruption, Bribery, or Misuse of Funds**
 - Theft or embezzlement of organizational resources

- Falsification of financial records or expense claims
- Accepting or offering bribes, kickbacks, or unauthorized gifts
- Misuse or diversion of donor funds or assets for personal or unauthorized use
- Conflicts of interest that are not disclosed or managed

b) Harassment, Discrimination, or Abuse

- Sexual harassment or inappropriate sexual behavior
- Bullying, intimidation, or verbal abuse in the workplace
- Discrimination based on gender, ethnicity, caste, religion, disability, age, sexual orientation, or other protected characteristics
- Physical or psychological abuse of staff, volunteers, or beneficiaries
- Any form of exploitation or abuse of vulnerable populations (e.g., children, persons with disabilities)

c) Violations of CMC-Nepal Policies or Code of Conduct

- Breaches of the organization's code of conduct, safeguarding policy, or Employee personnel policy
- Non-compliance with organizational procedures or donor requirements
- Misrepresentation of qualifications, identity, or background
- Unauthorized disclosure or misuse of confidential information
- Abuse of power or position for personal gain

d) Unsafe Practices or Threats to Health and Safety

- Unsafe working conditions or lack of compliance with safety protocols
- Neglect or failure to act in situations posing a risk to staff or community safety
- Reckless behavior during travel, fieldwork, or organizational events
- Environmental damage caused by negligence or improper practices

e) Unethical or Illegal Behavior

- Any behavior that is dishonest, unethical, or in violation of the law
- Attempted cover-ups or obstruction of investigations
- Retaliation against individuals who raise concerns or participate in investigations
- Use of CMC-Nepal's name, logo, or authority for unlawful or unauthorized purposes

These examples are **not exhaustive**, and any act that undermines CMC-Nepal's mission, values, or legal obligations may be reported. If you are unsure whether a behavior qualifies as a whistleblowing concern, you are still encouraged to report it so the appropriate support and guidance can be provided.

4. Reporting Channels

CMC-Nepal is committed to creating multiple safe, accessible, and confidential channels through which individuals can report concerns related to misconduct, unethical behavior, or violations of policies and laws. Whistleblowers can choose any of the following methods to report an issue, depending on what they are most comfortable with:

- **Email:** gunaso.cmcnepal@gmail.com

Concerns can be reported via a dedicated and secure email address as mentioned above. This email is monitored by the designated or an appointed member of the Senior Management Team, ensuring confidentiality and professional handling of your report.

Whistleblowers may choose to identify themselves or remain anonymous. However, providing contact details can help with follow-up and clarification, if needed.

- **Through Phone:**

Whistleblowers who prefer verbal communication can contact directly through mobile or landline with the designated staff. Calls can be made during working hours or, in urgent cases, after hours.

Callers may speak in Nepali or English language they are most comfortable.

- **In-Person:** Individuals may report concerns directly to **designated staff** or a trusted staff member he/she is comfortable with or a senior staff member specifically identified for receiving such reports.

In-person reporting is encouraged for individuals who feel comfortable sharing details face-to-face and want immediate clarification or reassurance.

A private space will be made available to ensure discretion and comfort during the reporting process.

- **"Gunaso Petika" Box:**

A physical **"Gunaso Petika" Drop Box** is installed in accessible locations within CMC-Nepal's Central office and provincial office. There, reports can be submitted anonymously in writing and deposited in the box. The box is locked and only accessible by authorized personnel on a routine/need basis. Whistleblowers are encouraged to provide as much specific information as possible (**WHO, WHAT, WHERE, WHEN**) to enable effective follow-up.

Whistleblowers are encouraged to report concerns **as soon as possible** after becoming aware of them. Multiple channels are available to ensure flexibility and to accommodate different levels of

comfort, literacy, access to technology, and privacy needs. All reports—regardless of the channel used—will be treated with the same seriousness, confidentiality, and respect.

If you are uncertain about which channel to use or whether your concern qualifies, you are still encouraged to come forward. Support will be provided to guide you through the process.

5. Confidentiality

CMC-Nepal understands and recognizes that individuals may be reluctant to report wrongdoing out of fear that their identity will be revealed or that they may face retaliation or negative consequences. To ensure trust in the whistleblowing process and to protect those who come forward, **confidentiality is treated as a top priority** in all aspects of receiving, handling, and investigating whistleblower reports.

a. Protection of Identity

- The identity of any person who reports a concern—whether named or anonymous—**will be kept strictly confidential**.
- No personal information or identifying details will be shared with anyone outside the designated personnel responsible for handling the case, **unless the whistleblower explicitly consents** to disclosure.
- In rare cases, disclosure may be required by law (e.g., during legal proceedings or regulatory inquiries). Even in such cases, the whistleblower will be informed in advance, and CMC-Nepal will take all possible steps to protect their safety and dignity.

b. Secure Handling of Information

- All reports are stored securely in password-protected systems or locked physical files, accessible only to authorized individuals involved in the whistleblowing process.
- Conversations, documents, and emails related to the whistleblower's report are treated as confidential records and not shared with unauthorized personnel under any circumstances.
- If translation or interpretation services are needed, they will be arranged in a way that also ensures confidentiality and neutrality.

c. Anonymity Option

- Whistleblowers have the **right to remain anonymous** when making a report.
- While anonymous reports may sometimes limit the ability to investigate fully, CMC-Nepal will make every reasonable effort to act on credible and specific anonymous disclosures.
- Whistleblowers who wish to remain anonymous should ensure they provide **clear, factual, and detailed information** in their initial report to support investigation.

d. Privacy of All Parties

- Confidentiality is extended not only to the whistleblower, but also to the individual(s) against whom allegations are made and any witnesses involved in the process.
- This ensures fairness and integrity of the process, and prevents harm to reputations unless wrongdoing is clearly established.

e. Commitment of CMC-Nepal

CMC-Nepal is fully committed to upholding confidentiality throughout the entire whistleblowing process. Breaches of confidentiality—intentional or negligent—by any staff member involved in receiving or managing whistleblower reports will be treated as a **serious disciplinary offense**.

6. Protection from Retaliation or Reverages

CMC-Nepal is deeply committed to fostering an environment where individuals feel safe and empowered to raise concerns without fear of negative consequences. To uphold this commitment, the organization strictly **prohibits any form of retaliation or reverages** against anyone who reports a concern honestly and in good faith.

a. What Constitutes Retaliation or Revenge?

Reverages can take many forms, including but not limited to:

- Intimidation, threats, or harassment
- Unjustified disciplinary action or demotion
- Exclusion, isolation, or unfair treatment at work
- Reassignment to less desirable duties or locations
- Negative performance evaluations or withholding of benefits
- Any other acts that could discourage or punish whistleblowing

b. Zero-Tolerance Policy

- Any attempt to retaliate against a whistleblower will be considered a **serious violation of CMC-Nepal's policies**.
- Individuals found to be engaging in retaliation will face **disciplinary measures**, which may include warnings, suspension, or termination of employment or association.
- CMC-Nepal will also take appropriate steps to protect whistleblowers from retaliation, including monitoring their work environment and providing support as needed.

c. Reporting Retaliation or Revenge

- Whistleblowers or any witnesses who experience or observe retaliation or revenge are strongly encouraged to report it immediately through the same reporting channels.
- Such reports will be treated with utmost seriousness and investigated promptly.
- Retaliation or revenge against anyone who participates in the investigation process is also strictly prohibited.

7. Investigation Process

CMC-Nepal commits to handling all reports of concerns with fairness, thoroughness, and confidentiality. The following outlines the typical steps taken once a report is received:

a. Initial Assessment

- Upon receipt, the designated Whistleblowing Officer or authorized personnel will **review the report promptly** to determine whether the concern falls within the scope of the guidelines.
- The initial assessment includes verifying the credibility of the information and deciding if further investigation is needed.

b. Formal Investigation

- If the concern warrants further inquiry, a **formal investigation** will be initiated.
- The investigation will be conducted by impartial and qualified personnel who have no conflict of interest in the case.
- Investigators may collect evidence, interview the whistleblower (if known and willing), witnesses, and the subject(s) of the complaint.
- Throughout the investigation, confidentiality will be strictly maintained to protect all parties involved.

c. Documentation

- All findings, evidence collected, and actions taken during the investigation will be **documented in writing**.
- Documentation will be stored securely and accessible only to authorized personnel.
- The outcome of the investigation will be based solely on factual findings and organizational policies.

d. Communication with the Whistleblower

- Where possible and appropriate, the whistleblower will be **kept informed** about the progress and final outcome of the investigation.
- This communication respects confidentiality and legal boundaries and aims to provide assurance that the concern was taken seriously and addressed.

e. Corrective Actions

- If misconduct is confirmed, CMC-Nepal will take appropriate **corrective or disciplinary actions** against those responsible.
- Actions may include retraining, policy changes, disciplinary sanctions, or referral to law enforcement if necessary.

f. Closure

- Once the investigation is concluded and necessary actions taken, the case will be formally closed.
- Feedback on lessons learned or policy improvements may be incorporated to strengthen organizational accountability.

8. Malicious or False Reporting

While CMC-Nepal is committed to encouraging the reporting of genuine concerns in good faith, it recognizes that intentionally making **false, misleading, or malicious allegations** can cause serious harm to individuals and the organization as a whole. Therefore, it is essential to address the consequences of such behavior clearly and fairly.

a. Definition of Malicious or False Reporting

- **False Reporting** refers to the act of knowingly submitting information that is untrue, fabricated, or deliberately distorted.
- **Malicious Reporting** involves making accusations with the intent to harm, intimidate, harass, or retaliate against an individual or group.
- This also includes exaggerating facts, withholding crucial information, or manipulating evidence to create a false impression.

b. Impact of False or Malicious Reports

- Such reports can damage the reputation and career of innocent individuals.
- They divert valuable resources and time away from addressing legitimate concerns.

- False accusations can erode trust in the whistleblowing system, discouraging others from coming forward with valid issues.
- They can create a toxic work environment, causing unnecessary conflict and distress.

c. Investigation of False Reports

- All reports, including those suspected to be false or malicious, will be investigated thoroughly and fairly.
- If an investigation concludes that a report was deliberately false or made with malicious intent, appropriate disciplinary action will be taken against the individual responsible.

d. Disciplinary Actions

- Disciplinary measures for knowingly false or malicious reporting may include:
 - Formal warnings or reprimands
 - Suspension or termination of employment or association with CMC-Nepal
 - Legal action, if applicable, especially in cases involving defamation or harassment

e. Protection of Genuine Whistleblowers

- It is important to distinguish between **malicious false reports** and **good faith reports that may be mistaken or cannot be fully substantiated**.
- Individuals who report concerns honestly and with reasonable grounds—even if the investigation does not find evidence to support the allegations—will **never** face disciplinary action or retaliation.
- CMC-Nepal values honesty and transparency and encourages all personnel to report concerns responsibly and respectfully.

f. Encouragement of Responsible Reporting

- Whistleblowers are encouraged to provide accurate, factual, and detailed information to assist with timely and effective investigations.
- The organization provides training and resources on how to report concerns appropriately and responsibly.

9. Responsibilities

The effectiveness of the whistleblowing mechanism relies on the active participation and accountability of everyone involved in CMC-Nepal's vision. Clear roles and responsibilities are essential to ensure that concerns are reported, handled appropriately, and resolved in a timely

manner. This section outlines the key responsibilities of different stakeholders within the organization.

a. Responsibilities of Employees and Stakeholders

- **Report Genuine Concerns:** All employees, volunteers, interns, consultants, partners, and other stakeholders and those who are directly /indirectly associated with CMC-Nepal are encouraged and expected to report any genuine concerns related to misconduct, unethical behavior, safety risks, or violations of policies and laws.
- **Good Faith Reporting:** Reports should be made honestly, with the intention of addressing issues, and not for personal gain, retaliation, or spreading false information.
- **Cooperate with Investigations:** Individuals who report concerns may be requested to provide additional information or participate in investigations. Cooperation is vital for thorough fact-finding.
- **Confidentiality:** Those who receive information about whistleblowing cases should respect the confidentiality of the process and avoid unauthorized disclosure.

b. Responsibilities of Management

- **Fair and Timely Handling:** All the Line Managers and supervisors must ensure that all reports received within their horizon are handled promptly, fairly, and without bias. They should support an environment where employees feel safe to speak up.
- **Confidentiality:** Management must safeguard the confidentiality of whistleblowers and the details of reports to prevent leaks or retaliation.
- **Prevent Retaliation:** Managers are responsible for preventing any form of retaliation or adverse treatment against whistleblowers within their teams or departments.
- **Provide Support:** Offer appropriate support and guidance to whistleblowers, including referrals to counseling or other resources if necessary.
- **Training and Awareness:** Ensure that all staff under their supervision are aware of the whistleblowing policy, understand how to report concerns, and recognize their own role in fostering an ethical workplace.

c. Responsibilities of the focal point of handling the whistleblowing:

- **Oversight of the Process:** The designated staff is responsible for managing the entire whistleblowing process, from receiving reports to overseeing investigations and ensuring proper resolution.

- **Protection of Whistleblowers:** Act as a trusted point of contact for whistleblowers, ensuring their identity is protected and they are shielded from retaliation.
- **Coordination of Investigations:** Coordinate with relevant departments or divisions, such as Human Resources, Legal, or external experts, to carry out impartial and thorough investigations.
- **Documentation and Record-Keeping:** Maintain secure, accurate, and confidential records of all reports, investigations, and outcomes.
- **Reporting to Senior Management and Board:** Provide periodic, anonymized updates to senior leadership and the Executive Board on whistleblowing activities, trends, and recommendations to strengthen organizational integrity.
- **Policy Review and Improvement:** Regularly review and update the whistleblowing guidelines and procedures to reflect best practices, legal requirements, and organizational changes.
- **Training and Awareness:** Lead awareness campaigns and training sessions to promote understanding and accessibility of the whistleblowing system across the organization.

10. Review and Updates

To ensure that the whistleblowing guidelines remain effective, relevant, and aligned with the evolving legal, ethical, and organizational standards, CMC-Nepal commits to a systematic process of regular review and timely updates. This process is essential to maintaining a robust mechanism that continuously protects whistleblowers, promotes transparency, and supports organizational integrity.

This structured approach to review and updates ensures that CMC-Nepal's whistleblowing framework remains dynamic, responsive, and effective in safeguarding ethical conduct within the organization.