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# **IMRO RWANDA WHISTLEBLOWING POLICY**

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## **1. Introduction**

Ihorere Munyarwanda Organization (IMRO Rwanda) is a Non-Governmental Organization that was founded in 1999 and has been legally operating in Rwanda since 2002. With two decades of experience, IMRO Rwanda has been actively involved in addressing various societal challenges, including poverty alleviation, gender equality, nutrition, gender-based violence (GBV), HIV prevention, education, environmental conservation, peace building, health promotion, accountability, advocacy, and networking. Our primary goal is to enhance the well-being of Rwandan citizens at the individual, family, and community levels, ultimately contributing to sustainable socioeconomic development.

IMRO Rwanda (Ihorere Munyarwanda Organization) is a nationally recognized Non-Governmental Organization, holding legal personality No 03/11 in Rwanda. Our organization is dedicated to the promotion and protection of human rights, with a specific focus on sexual and reproductive health rights and HIV prevention. We adopt a human rights-based approach and prioritize justice strengthening as we work tirelessly toward our vision of achieving excellence in harmonizing policies and legislations for a healthier society.

Our efforts encompass a wide spectrum of interventions targeting the general population, women, youth, children, key populations, and vulnerable groups in Rwanda. IMRO Rwanda collaborates closely with various government departments, local institutions, and international partners to develop and implement strategies that safeguard the sexual and reproductive health and rights of all Rwandans.

Our multifaceted approach involves engagement with diverse stakeholders, including women's and youth organizations, health providers, educational institutions, religious bodies, and community members. By doing so, we aim to empower individuals

and communities with the information and services necessary to make informed decisions about their sexual and reproductive health.

IMRO Rwanda is committed to high standards of ethical conduct and accordingly places great importance on making clear any existing or potential conflict of interest.

## **2. Purpose**

The purpose of this policy is to establish controls that facilitate compliance with anti-bribery and corruption regulations. It aims to ensure that IMRO Rwanda's business is conducted in a socially responsible and ethical manner.

## **3. Scope**

This policy applies to all individuals associated with IMRO Rwanda, including executives, officers, project managers, employees, consultants, contractors, casual workers, and agency workers. It's important to note that this policy does not form part of any employee's contract of employment and may be amended at any time.

## **4. Definition**

Whistleblowing involves the disclosure of information related to suspected wrongdoing or potential dangers within the workplace. This may include:

- Criminal activity
- Violations of Anti-corruption and Bribery Policies
- Financial fraud or mismanagement
- Failure to comply with legal, professional, or regulatory requirements
- Health and safety hazards
- Bullying, sexual or other harassment

- Safeguarding concerns
- Conflicts of interest
- Breach of internal policies and procedures
- Conduct that may harm our reputation or financial well-being
- Negligence
- Deliberate concealment of any of the above matters

A whistleblower is an individual who raises a genuine concern related to any of the aforementioned issues. If you have a legitimate concern regarding suspected wrongdoing or danger affecting IMRO RWANDA's activities, you should report it under this policy.

## **5. Policy Statement**

IMRO Rwanda is committed to operating in accordance with its tax-exempt purposes and complying with all relevant laws, rules, and regulations, including those pertaining to accounting and auditing. We prohibit fraudulent practices by any board members, officers, employees, or volunteers. This policy outlines a procedure for reporting actions that may violate laws, regulations, or involve fraudulent accounting within IMRO Rwanda's business.

This policy applies to any matter related to IMRO Rwanda's business and does not pertain to personal circumstances unrelated to IMRO Rwanda's operations. Complaints regarding personal treatment at work should be addressed using the appropriate anti-harassment and anti-bullying procedures.

### **5.1 Assurance to Staff**

IMRO Rwanda assures all employees, officers, project managers, consultants, contractors, casual workers, and agency workers that they will not face job loss or retribution for raising a genuine concern under this policy. We understand that whistleblowers may have concerns about potential repercussions. IMRO Rwanda encourages openness and will support those who, in good faith, raise genuine concerns under this policy, even if the concerns turn

out to be mistaken. However, individuals making deliberately false allegations will not be protected by this policy. Deliberate false allegations include knowingly making untrue claims to harm a colleague or gain an advantage.

IMRO Rwanda is fully committed to this policy and maintains a zero-tolerance stance against harassment or victimization of whistleblowers. Whistleblowers will not face detrimental treatment for raising genuine concerns. Detrimental treatment encompasses dismissal, disciplinary action, threats, or any unfavorable treatment related to whistleblowing concerns.

If you believe you have faced such treatment, please inform the HR Director immediately. If the issue remains unresolved, staff should follow the anti-harassment or anti-bullying procedure.

We hope that every individual working with or for IMRO Rwanda will feel comfortable voicing their whistleblowing concerns openly under this policy. However, if you prefer to raise your concern confidentially, IMRO Rwanda will make every effort to protect your identity. If revealing your identity becomes necessary for the investigation, IMRO Rwanda will discuss this with you.

IMRO Rwanda will consider anonymous disclosures; however, please note that anonymous disclosures may complicate or render impossible a proper investigation, as obtaining further information may be challenging. Additionally, it may be more difficult to assess the credibility of allegations.

## **5.2 Applicability to Specific Cases**

If you reasonably believe that another employee or IMRO Rwanda has engaged in actions violating applicable laws, regulations, or involving fraudulent practices, you are expected to report this information promptly. You can report it to the Executive Director. If you are uncomfortable reporting to the Executive Director, you may

report the information to the Human Resource Officer or the Staff Representative.

All reports will be promptly followed up, and investigations will be conducted. IMRO Rwanda will strive to maintain the confidentiality of the reporting individual while conducting a thorough review and investigation.

IMRO RWANDA will not retaliate against an employee for:

- ✓ Reporting a violation of the law or regulation in good faith to a supervisor, the Executive Director, or a project manager.
- ✓ Participating in good faith in any ensuing investigation or proceeding.
- ✓ Exercising their rights under state or federal regulation(s) to pursue a claim or take legal action to protect their rights.

IMRO Rwanda may take disciplinary action, including termination, against any employee engaged in retaliatory conduct in violation of this policy. Additionally, IMRO Rwanda will not take any action harmful to an employee who has provided truthful information to law enforcement or a court regarding potential violations by IMRO Rwanda or its employees of applicable laws or regulations. Supervisors will be trained on this policy and IMRO Rwanda 's prohibition against retaliation in accordance with this policy.

## **6. Investigation Process**

Once a concern is raised, the appropriate management will conduct an initial assessment to determine the scope of the investigation. IMRO Rwanda will inform the concerned employee of the assessment outcome (unless the concern was raised anonymously). The employee may be required to attend additional meetings to provide further information.

The investigation process will vary based on the specific circumstances of each case. However, IMRO Rwanda will always

strive to conduct a thorough, prompt, and confidential investigation. Depending on the situation, the investigation may involve staff at all levels, including Finance and Human Resources, and external support such as internal audit.

IMRO Rwanda will aim to keep the concerned employee informed about the investigation's progress, and the outcome will be reported back with as much detail as is appropriate and reasonable. In some cases, the need for confidentiality may prevent IMRO Rwanda from providing specific details of the investigation or any disciplinary actions taken. The employee should treat all information about the investigation as confidential.

## **7. External Disclosures**

This policy primarily provides an internal mechanism for reporting, investigating, and addressing wrongdoing within the workplace. In most cases, external reporting should not be necessary. IMRO Rwanda encourages everyone to seek advice from a senior staff member before reporting a concern externally.

While whistleblowing concerns typically relate to the conduct of IMRO Rwanda staff, they may occasionally involve third parties such as donors, customers, suppliers, or service providers. In such cases, IMRO Rwanda encourages individuals to report concerns internally first, either directly to IMRO Rwanda management or through the independent reporting service.

## **8. Roles and Responsibilities**

### **8.1. Employees**

All employees are responsible for:

- Complying with this policy.



- Not engaging in any form of threat or retaliation against whistleblowers. Engaging in such conduct may result in disciplinary action.

## **8.2. Project Managers**

In addition to their responsibilities as employees, project managers are responsible for:

- Implementing this policy and related processes.
- Collaborating with the Human Resources department to investigate whistleblowing concerns when required.
- Providing support to whistleblowers within their work area and ensuring they are treated appropriately by colleagues and others.

## **8.3 Human Resource Officer**

The Human Resource Officer is responsible for:

- Providing guidance and training to project managers to support the policy's implementation.
- Offering support during investigations and providing necessary Human Resource assistance.
- Collaborating with third parties to effectively implement this policy.
- Monitoring the policy's effectiveness through anonymous surveys, analysis of Human Resource data, and other appropriate means. The Human Resource Officer will also review procedures and criteria in consultation with IMRO Rwanda management and employees to enhance policy implementation.

## 9. Whistleblowing Report Form

**Date of Report:**

### **Section 1. Contact information (Optional)**

Full Name:

Phone Number:

Email Address:

### **Prefer to Remain Anonymous**

Yes:

No:

**If yes, why:**

### **Section 2: Whistleblowing Details**

#### **Nature of Concern:**

Please describe the concern in detail. Include relevant facts, dates, and individuals involved. Be as specific as possible.

#### **Category of Concern: (Check all that apply)**

Criminal activity

Violations of Anti-corruption and Bribery Policies

- Financial fraud or mismanagement
- Failure to comply with legal, professional, or regulatory requirements
- Health and safety hazards
- Bullying, sexual or other harassment
- Safeguarding concerns
- Conflicts of interest
- Breach of internal policies and procedures
- Conduct that may harm IMRO RWANDA's reputation or financial well-being
- Negligence
- Deliberate concealment of any of the above matters

**Witnesses or Supporting Documents:**

Please provide the names and contact information of any witnesses or attach any supporting documents, if applicable.

**Additional Comments (Optional):**

Is there any additional information or context you believe is important to consider?

**Declaration:**

I hereby declare that the information provided in this report is true and accurate to the best of my knowledge. I understand that making a deliberately false allegation may result in disciplinary action.

I agree.

**Submission:**

1. **Electronically:** Visit our website and submit the form by clicking the "Submit" button.
2. **In Person:** Visit the HR office and submit the form in person.

Your report will be received by the designated authorities for investigation.

**Confidentiality Notice:**

Your identity and the information provided will be treated confidentially to the extent permitted by law. IMRO Rwanda is committed to protecting whistleblowers from retaliation and maintaining their privacy during investigations. However, anonymous reports may limit the ability to conduct thorough investigations.

**Approved by;**

Aimable MWANANAWE  
IMRO Rwanda Executive Director



Flavienne NDAYISHIMIYE  
Legal Representative.

