

**THE EUROPE-UZBEKISTAN ASSOCIATION FOR ECONOMIC COOPERATION (EUROUZ)**

**Bribery Whistleblowing Policy**

(Version 1.0)

**Introduction – The Anti-Bribery Act**

Bribery is defined in a comprehensive way, namely as a gift or donation intended to “induce a person to perform improperly, a relevant function or activity”. EUROUZ values its reputation and is committed to maintaining the highest level of ethical standards in the conduct of its business affairs. The actions and conduct of the Association’s members and others acting on the Association’s behalf are key to maintaining these standards.

To ensure all our members and staff (herein “members”) feel comfortable raising any concerns regarding bribery in the workplace, we have created a detailed whistleblowing policy. We hope that all members read the policy and refer to it should any concerns arise. Should you have any questions or require clarification regarding our whistleblowing policy, feel free to speak to the EUROUZ Secretariat.

**Purpose and scope**

All organizations face the risk of things going wrong or unknowingly harbouring malpractice. EUROUZ takes malpractice very seriously. We encourage open communication from our members. We want you to feel secure about raising your concerns. All members have statutory protection if they raise concerns regarding bribery in the right way. This policy is designed to give members that opportunity and protection.

It does not matter if you are mistaken. You do not have to prove anything about the allegation you are making, but you must reasonably believe the information you have tends to show some malpractice. This policy applies to members and EUROUZ staff.

**When to use this policy**

There is a difference between whistleblowing and raising a grievance:

· Whistleblowing is where you have a concern about danger or illegality that has a public interest aspect to it (e.g. because it threatens clients, third parties or the public).

· A grievance or complaint generally relates to your employment position and does not have an additional public interest dimension.

This policy is not the procedure for general grievances. If you have a complaint about your circumstances, you should use the standard grievance procedure.

### **Concerns covered by this policy**

The sort of concerns covered by this policy are:

- That a criminal offence has been, is being or is likely to be committed;
- That an employee has knowingly accepted or offered a bribe;
- That a client or third party has knowingly accepted or offered a bribe;
- Danger to the health and safety of any individual;
- Deliberate concealment of any of the above.

### **Our guarantee**

EUROUZ is committed to this policy. If you use this policy to raise a concern, we assure you that you will not suffer any form of retribution or detrimental treatment. We will treat your concern seriously and act according to this whistleblowing policy. If you ask for a matter to be treated in confidence, we will respect your request and only make disclosures to third parties, partners, or other members with your consent. This assurance applies regardless of whether the subject matter of your concern, report or disclosure relates to this company, a client or a third party.

### **Procedure for raising concerns under this policy**

If you are concerned about any form of malpractice covered by this policy, you should normally raise the issue with the Secretariat. If for whatever reason, you feel you cannot tell, you should raise the issue with the Compliance Officer. If the Compliance officer is unavailable, you should discuss your concerns with the Secretary-General.

Concerns can be raised orally or in writing. When raising the concern, you may choose to include your identity or remain anonymous. You may wish to discuss your concern with a colleague before formally raising it under this policy. However, remember that once you have raised your concern (alone or with your colleague), this is a confidential process in the interests of everyone involved.

### **Responding to concerns raised**

After a member has raised a concern, we will record that concern in our Whistleblowing Report Register, which the Compliance officer maintains. The compliance officer shall maintain the whistleblowing Report Registry.

We will then decide how to respond responsibly and appropriately under this policy. This will usually involve making internal enquiries first, but it may be necessary to investigate later. This may be formal or informal, depending on the nature of the concern raised. We will endeavour to complete investigations within a reasonable time. We will keep you informed of the investigation's progress and when it is completed. Please note that we will not notify you of any matters that would infringe the duty of confidentiality owed to others.

### **Raising your concern externally (exceptional cases)**

The purpose of this policy is to give members the opportunity and protection they need to raise concerns internally. We expect that raising concerns internally would be the most appropriate action for you to take in almost all cases.

### **Regulatory disclosures**

If for whatever reason, you feel you cannot raise your concerns internally and you reasonably believe the information and any allegations are substantially accurate, you can consider increasing the matter with the Compliance Officer. The compliance officer shall refer the disclosure to the relevant regulator as per the law of appropriate jurisdiction.

### **Wider disclosures**

If you have good reasons for not using the internal or regulatory disclosure procedures described above, you may consider making a more comprehensive disclosure, e.g., reporting the matter to the police or the media.

Caution: whistle-blowers who make broader disclosures of this type will only be protected in certain circumstances (such as from dismissal or suffering detrimental treatment). EUROUZ recommends that employees take independent legal advice before following this course of action.

### **Respecting third party confidentiality**

When making external disclosures, you should be aware of your obligation to keep the affairs of a third party confidential unless:

- Disclosure is required or permitted by law; or
- The third-party consents.

### **Consequences of breaching this policy**

Those using the procedure outlined in this policy to raise a concern are assured that they will not suffer any form of retribution or detrimental treatment. Any person who victimises a bona fide whistle-blower will be liable to disciplinary action. To ensure the protection of all our employees, those who maliciously make a false allegation will be liable to disciplinary action.

### **Monitoring and review**

EUROUZ will regularly monitor the effectiveness of this policy at least annually to ensure it is working in practice. We will provide information and/or training on any changes that are made.