

**East Action  
Organization**



# **WHISTLEBLOWING POLICY**

**Prepared By:**

**East Action  
Organization  
Action For Betterment**

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# 1. INTRODUCTION

## 1.1. Commitment to Ethical Practices

EAO believes that maintaining the highest ethical standards is fundamental to achieving our mission and upholding the trust placed in us by our stakeholders, including beneficiaries, donors, partners, and the communities we serve. We are dedicated to creating an environment where ethical conduct is the norm and misconduct is neither tolerated nor ignored.

## 1.2. Purpose

The purpose of this Whistleblowing Policy is to:

- Encourage Reporting: Motivate all employees, volunteers, partners, and stakeholders to report any suspected misconduct without fear of reprisal.
- Provide Clear Procedures: Establish straightforward and confidential procedures for reporting and handling concerns about misconduct.
- Protect Whistleblowers: Ensure that individuals who report concerns in good faith are protected from retaliation or any adverse consequences.
- Promote Ethical Culture: Foster a culture of openness, transparency, and ethical responsibility within EAO, reinforcing our commitment to integrity and accountability.
- Ensure Compliance: Maintain compliance with all applicable laws, regulations, and internal policies to uphold our legal and ethical obligations.

## 1.3. Scope

This policy applies to all individuals associated with EAO, including but not limited to:

- Employees: All full-time, part-time, permanent, temporary, and contractual staff members of EAO.
- Volunteers and Interns: Individuals who offer their time and services to support EAO's activities without financial compensation.
- Consultants and Contractors: External parties engaged by EAO to provide services or execute projects.
- Partners and Suppliers: Organizations and individuals in a business or collaborative relationship with EAO, including vendors, service providers, and implementing partners.
- Donors and Beneficiaries: Individuals and organizations that provide resources to EAO or benefit from our programs and services.
- Stakeholders and Community Members: Any other individuals who interact with EAO and may witness or be affected by misconduct.

## 1.4. Definitions

For the purposes of this policy, the following definitions apply:

- **Whistleblowing:** The act of reporting, in good faith, any suspected or actual wrongdoing, misconduct, or unethical behavior that may be illegal, unethical, or in violation of EAO's policies.
- **Whistleblower:** An individual who reports concerns about misconduct under this policy. The whistleblower may be an employee, volunteer, partner, stakeholder, or any person associated with EAO.
- **Misconduct:** Any behavior or action that is illegal, unethical, or improper, including but not limited to:
- **Fraud:** Deception intended to result in financial or personal gain.
- **Corruption:** Abuse of entrusted power for private gain, including bribery and nepotism.
- **Harassment and Discrimination:** Unwanted conduct affecting the dignity of individuals, including sexual harassment, bullying, or discrimination based on race, gender, age, religion, or any other protected characteristic.
- **Safety Violations:** Actions that compromise the health and safety of individuals or the environment.
- **Violation of Policies:** Breach of EAO's internal policies, procedures, or codes of conduct.
- **Financial Impropriety:** Misuse of funds, embezzlement, or unauthorized use of organizational assets.
- **Unethical Conduct:** Any behavior that does not align with EAO's ethical standards and values.
- **Retaliation:** Any form of adverse action or threat taken against a whistleblower as a direct consequence of their reporting. Retaliation may include, but is not limited to:
- **Employment Actions:** Dismissal, demotion, suspension, loss of benefits, or unfavorable changes in job duties or working conditions.
- **Harassment or Intimidation:** Any action that creates a hostile or intimidating environment for the whistleblower.
- **Blacklisting:** Hindering future employment opportunities within or outside EAO.
- **Other Adverse Consequences:** Any other actions that negatively affect the whistleblower's position, rights, or well-being.

## 1.5. Policy Statement

EAO is committed to maintaining an environment where concerns about misconduct can be raised without fear of retaliation or adverse consequences. The organization recognizes the valuable role that whistleblowers play in safeguarding the integrity and reputation of EAO.

### Key Commitments:

- **Encouragement of Reporting:**
  - EAO encourages all stakeholders to report any suspected or actual misconduct promptly.

- Reports should be made in good faith, with reasonable belief that the information disclosed indicates wrongdoing.
- **Serious Treatment of Reports:**
  - All reports will be taken seriously and addressed promptly.
  - EAO is committed to conducting thorough, fair, and impartial investigations.
- **Protection from Retaliation:**
  - Whistleblowers will be protected against any form of retaliation or adverse action resulting from their report.
  - Any act of retaliation is a serious violation of this policy and will result in disciplinary action.
- **Confidentiality:**
  - The identity of the whistleblower and the details of the report will be kept confidential to the greatest extent possible, consistent with the need to conduct a proper investigation.
- **No Tolerance for Misconduct:**
  - EAO has zero tolerance for illegal, unethical, or improper conduct.
  - Appropriate corrective actions, including disciplinary measures or legal action, will be taken against individuals found to have engaged in misconduct.
- **Good Faith Reporting:**
  - Individuals are encouraged to report concerns even if they are unsure whether a violation has occurred.
  - Reports made maliciously or with knowledge of their falsity are prohibited and may result in disciplinary action.
- **Accessibility of Reporting Channels:**
  - Multiple reporting channels are available to ensure accessibility and convenience for all stakeholders.
  - Anonymity options are provided for those who prefer not to disclose their identity.
- **Continuous Improvement:**
  - EAO is committed to learning from reported incidents to improve policies, procedures, and organizational culture.
  - Regular reviews of this policy and related procedures will be conducted to enhance their effectiveness.

## 2. REPORTING PROCEDURES

Effective reporting procedures are crucial for timely identification and resolution of misconduct. EAO has established multiple channels to facilitate the reporting process, ensuring that all individuals feel comfortable and secure when raising concerns.

### 2.1. Reporting Channels

EAO provides several avenues for reporting concerns to accommodate the preferences and circumstances of all individuals associated with the organization. Reports can be made through any of the following channels:

#### 2.1.1. Immediate Supervisor or Manager

**- Open Dialogue:**

- Employees are encouraged to discuss concerns directly with their immediate supervisor or manager when they feel comfortable doing so.
- This direct approach can often lead to swift resolution of issues at an early stage.

**- Supervisor's Responsibility:**

- Supervisors are obligated to take all reports seriously and to handle them in accordance with this policy.
- They must maintain confidentiality and, if necessary, escalate the matter to the appropriate department or officer.

#### 2.1.2. Human Resources Department

**- Contact Information:**

- HR Manager: Duh Ahmed Abdullah
- Phone: 0915773851
- Email: [hr@eastaction.org](mailto:hr@eastaction.org)

**- Role of HR:**

- The HR Department serves as a resource for employees to report concerns, seek advice, and receive support.
- HR will document the report and coordinate with relevant parties to initiate an investigation if required.

#### 2.1.3. Whistleblowing Officer

**- Designated Officer:**

- Name: Natnael Tlahun
- Phone: 0941705731



- Email: [whistleblower@eastaction.org](mailto:whistleblower@eastaction.org)

**- Responsibilities:**

- The Whistleblowing Officer is specifically appointed to handle reports of misconduct.
- They ensure that reports are processed confidentially and that investigations are conducted impartially.

## 2.1.4. Whistleblower Hotline

**- 24/7 Confidential Hotline:**

- Phone Number: 1-800-555-0199
- Availability: Operates 24 hours a day, 7 days a week.

**- Features:**

- Allows individuals to report concerns at any time, especially outside of regular working hours.
- Operated by trained personnel who can guide the reporter through the process.

**- Anonymity Option:**

- Callers may choose to remain anonymous if they prefer.

## 2.1.5. Email Reporting

**- Dedicated Email Address:**

- Email: [whistleblower@eao.org](mailto:whistleblower@eao.org)

**- Submission Guidelines:**

- Provide a detailed description of the concern, including dates, times, locations, and names of individuals involved, if known.
- Attach any supporting documents or evidence, if available.

**- Confidentiality:**

- The email account is monitored by the Whistleblowing Officer to ensure confidentiality.

## 2.1.6. Online Reporting Form

**- Secure Online Portal:**

- Website: [www.eao.org/whistleblowing](http://www.eao.org/whistleblowing)

**- Features:**

- User-friendly interface accessible from any device with internet access.
- Option to report anonymously or provide contact information.

**- Submission Guidelines:**

- Complete the form with as much detail as possible to facilitate a thorough investigation.
- Upload supporting documents or evidence securely through the portal.
- Data Security:
- The online system is encrypted to protect the information submitted.

## 2.1.7. Postal Mail

### - Mailing Address:

- EAO Natnael Tlahun
- Address: jigjig

### - Guidelines:

- Mark the envelope as "Confidential" to ensure it is handled appropriately.
- Include detailed information and any supporting documents.

### - Considerations:

- Suitable for those who prefer traditional mail or when digital access is limited.

## 2.2. Anonymity and Confidentiality

EAO is committed to protecting the identity of individuals who report concerns, whether they choose to remain anonymous or disclose their identity.

### 2.2.1. Anonymity

#### - Option to Remain Anonymous:

- Reporters may choose not to reveal their identity when making a report.
- Anonymous reports will be investigated to the extent possible, but anonymity may limit the ability to obtain additional information.

### 2.2.2. Confidentiality

#### - Confidential Handling:

- The identity of the whistleblower (if disclosed) and the details of the report will be kept confidential, shared only on a need-to-know basis.

#### - Information Security:

- All reports and related documents will be securely stored to prevent unauthorized access.

#### - Limitations:

- In certain cases, legal obligations may require disclosure of the whistleblower's identity (e.g., during legal proceedings), but EAO will strive to inform the individual beforehand.

## 2.3. Guidance on Making a Report

To facilitate an effective investigation, individuals are encouraged to provide as much detail as possible, including:

### - Description of the Concern:

- Clear and concise explanation of the suspected misconduct.
- Individuals Involved:

- Names and positions of those involved or who may have relevant information.
- Dates and Times:**

- Specific dates, times, and frequency of the alleged misconduct.

**- Supporting Evidence:**

- Any documents, emails, photographs, or other materials that support the report.
- Witnesses:
- Names of any other individuals who may have witnessed the misconduct.

## 2.4. Assistance and Support

**- Seeking Advice:**

- If uncertain about whether to report a concern or which channel to use, individuals may seek confidential advice from:
  - Human Resources Department
  - Whistleblowing Officer

**- Language and Accessibility:**

- Reports can be made in the individual's preferred language.
- Assistance is available for those with disabilities or requiring special accommodations.

## 2.5. No Requirement for Proof

**- Good Faith Reporting:**

- Individuals are not required to have proof of misconduct to make a report.
- A reasonable belief or suspicion is sufficient.

**- No Investigative Responsibility:**

- Whistleblowers are not expected to investigate the matter themselves; this is the responsibility of the designated authorities within EAO.

## 2.6. Protection of the Accused

**- Fair Treatment:**

- Individuals accused of misconduct are presumed innocent until proven otherwise.
- Investigations will be conducted fairly and impartially.

**- Confidentiality:**

- Information about the allegations and the investigation will be kept confidential to protect all parties involved.

## 3. INVESTIGATION PROCESS

The EAO is committed to thoroughly investigating all reports of misconduct in a fair, timely, and confidential manner. The investigation process comprises several stages designed to ensure that concerns are addressed appropriately and that all parties involved are treated with respect and impartiality.

### 3.1. Acknowledgment

**- Timely Confirmation:**

- If the whistleblower has provided contact information, they will receive a written acknowledgment of their report within five (5) business days of receipt.
- The acknowledgment will confirm that the report has been received and will outline the next steps in the investigation process.

**- Anonymous Reports:**

- While anonymous reports cannot be acknowledged directly, they will be treated with the same level of seriousness and investigated to the extent possible.

### 3.2. Preliminary Assessment

**- Initial Review:**

- Upon receiving a report, the Whistleblowing Officer or designated investigator will conduct a preliminary assessment within ten (10) business days to determine:

**- The validity of the allegations.**

- Whether the matter falls within the scope of this policy.
- The potential impact and urgency of the situation.

**- Assessment Criteria:**

- The assessment will consider factors such as:
  - Credibility of the information provided.
  - Availability of corroborating evidence.
  - Risk to individuals or the organization.

**- Decision on Proceeding:**

- Based on the preliminary assessment, a decision will be made on whether to:
- Proceed with a formal investigation.
- Refer the matter to a different department or process (e.g., HR for personnel issues).
- Close the report if it lacks sufficient basis or pertains to matters outside the policy's scope.

### 3.3. Formal Investigation

#### - Appointment of Investigator:

- An impartial and qualified investigator or investigation team will be appointed, which may include:
- Internal personnel with no conflict of interest.
- External independent experts or third parties if necessary to ensure objectivity.

#### - Investigation Plan:

- An investigation plan will be developed outlining:
  - Scope and objectives of the investigation.
  - Methodology and steps to be taken.
  - Timelines for completion.

#### - Conducting the Investigation:

- Evidence Collection:
  - Gather all relevant evidence, including documents, emails, records, and physical evidence.
- Interviews:
  - Conduct interviews with the whistleblower (if known), the subject(s) of the report, witnesses, and any other relevant parties.
  - Interviews will be conducted respectfully and confidentially.

#### - Confidentiality:

- All information obtained during the investigation will be kept confidential and shared only on a need-to-know basis.

#### - Rights of the Parties Involved:

- Whistleblower:
  - Will be protected from retaliation.
  - May be asked to provide additional information or clarification.

#### - Subject of the Report:

- Will be informed of the allegations at an appropriate stage.
- Will be given an opportunity to respond to the allegations.

#### - Timelines:

- The formal investigation should be completed within thirty (30) business days, unless extended due to the complexity of the case.
- Any extensions will be communicated to relevant parties.

### 3.4. Outcome and Actions

#### - Investigation Report:

- Upon completion, the investigator will prepare a detailed report summarizing:
  - The allegations.
  - Methodology of the investigation.
  - Evidence gathered.
  - Findings and conclusions.
  - The report will be submitted to the appropriate authority within EAO, such as the Executive Director or the Board of Directors.
- **Decision Making:**
  - The designated authority will review the report and determine the appropriate course of action.
  - Possible Actions:
  - If Misconduct is Substantiated:
- **Disciplinary Measures:**
  - Actions may include verbal or written warnings, suspension, demotion, termination of employment or contract, or other appropriate disciplinary actions.
  - Policy or Procedural Changes:
  - Implement changes to prevent recurrence, such as revising policies, improving controls, or providing additional training.
- **Legal Action:**
  - Refer the matter to law enforcement or regulatory bodies if legal violations are identified.
  - If Misconduct is Not Substantiated:
- **Case Closure:**
  - The case will be closed with no further action against the subject.
- **Record Keeping:**
  - Documentation will be retained securely in accordance with record-keeping policies.
- Communication of Outcome:
- **Whistleblower:**
  - Where appropriate and permissible, the whistleblower will be informed of the investigation's outcome, maintaining confidentiality and legal considerations.
- **Subject of the Report:**
  - Will be informed of the investigation's conclusion and any actions affecting them.

### 3.5. Feedback

- Providing Feedback to the Whistleblower:
- Content of Feedback:

- The feedback may include general information about the investigation's status and outcome but will not disclose confidential details.
- Timeliness:
  - Feedback will be provided promptly after the conclusion of the investigation.
- Encouraging Further Communication:
  - Whistleblowers are encouraged to reach out if they have additional information or concerns.
- Limitations on Disclosure:
  - Due to confidentiality obligations, certain details may not be disclosed to the whistleblower or other parties.

### 3.6. Appeals Process

#### - Right to Appeal:

- If the whistleblower or the subject of the report is dissatisfied with the outcome, they may submit an appeal.

#### - Appeal Submission:

- Appeals must be submitted in writing within ten (10) business days of receiving the outcome notification.

#### - Appeal Review:

- An independent party not involved in the original investigation will review the appeal.
- Final Decision:
- The decision on the appeal is final and will be communicated in writing.

### 3.7. Confidentiality and Data Protection

#### - Data Handling:

- All records and data collected during the investigation will be handled in compliance with data protection laws and EAO's policies.

#### - Access to Information:

- Access to investigation records is restricted to authorized personnel.

### 3.8. Record Keeping

#### - Documentation:

- All documents related to the investigation, including reports, evidence, and communications, will be securely stored.

#### - Retention Period:

- Records will be retained for a minimum of specify number of years, e.g., five (5) years or as required by law.

## 4. PROTECTION AGAINST RETALIATION

EAO is committed to fostering an environment where individuals feel safe and supported when reporting concerns about misconduct. Retaliation against any person who reports a concern in good faith is strictly prohibited. This section details the protections in place and the procedures for reporting and addressing any acts of retaliation.

### 4.1. Non-Retaliation Assurance

#### - **Commitment to Protection:**

- EAO unequivocally assures all employees, volunteers, partners, and stakeholders that they can report concerns without fear of retaliation.
- Retaliation against a whistleblower or any individual involved in an investigation is a serious violation of this policy.

#### - **Definition of Retaliation:**

- Retaliation includes any form of adverse action taken against an individual as a direct result of their reporting or participation in an investigation. This may involve:

#### - **Employment Actions:**

- Dismissal, demotion, suspension, or unfavorable changes in job duties or working conditions.
- Harassment or Intimidation:
- Creating a hostile work environment, threats, or coercion.
- Other Adverse Effects:
- Negative impacts on compensation, benefits, or opportunities for advancement.

#### - **Scope of Protection:**

- Protection against retaliation extends to:
- Individuals who report concerns in good faith, even if the allegations are not substantiated.
- Witnesses and individuals who participate in an investigation.
- Individuals who refuse to engage in activities that violate laws or EAO policies.

### 4.2. Reporting Retaliation

#### - **Immediate Reporting:**

- Any individual who believes they have been subjected to retaliation should report it immediately through any of the established reporting channels:

#### - **Whistleblowing Officer:**

- Name: Natnael Tlahun
- Phone: 0941705731
- Email: [whistleblower@eastaction.org](mailto:whistleblower@eastaction.org)

#### - **Human Resources Department:**

- HR Manager: Dhu Ahmed Abdullah



- Phone: 0915773851
- Email: [hr@eastaction.org](mailto:hr@eastaction.org)
- **Whistleblower Hotline:**
  - Phone: 1-800-555-0199
- **Online Reporting Form:**
  - Website: [www.eao.org/whistleblowing](http://www.eao.org/whistleblowing)
- **Content of Retaliation Report:**
  - When reporting retaliation, individuals should provide:
    - A description of the retaliatory actions experienced.
    - Dates, times, and locations of incidents.
    - Names of individuals involved in or witnessing the retaliation.
    - Any supporting evidence or documentation.
- **Confidentiality:**
  - Reports of retaliation will be treated with the same level of confidentiality as other reports under this policy.
  - The identity of the individual reporting retaliation will be protected to the fullest extent possible.

### 4.3. Investigation of Retaliation Claims

- **Prompt Action:**
  - EAO will promptly investigate all reports of retaliation in accordance with the procedures outlined in Section 3: Investigation Process.
- **Fair and Impartial Investigation:**
  - Investigations will be conducted impartially, respecting the rights of all parties involved.
- **Interim Measures:**
  - If necessary, interim measures may be implemented to protect the individual reporting retaliation while the investigation is ongoing.

### 4.4. Consequences of Retaliation

- **Disciplinary Actions:**
  - Individuals found to have engaged in retaliation will face appropriate disciplinary action, which may include:
    - **Verbal or written warnings.**
    - Suspension or demotion.
    - Termination of employment or contractual relationship.
- **Legal Consequences:**

- In cases where retaliation violates laws or regulations, EAO may refer the matter to legal authorities for further action.

**- Organizational Measures:**

- EAO may implement additional measures to prevent future retaliation, such as policy revisions, training, or changes in procedures.

## 4.5. Protection of Rights

**- Good Faith Reporting:**

- Protection against retaliation is afforded to all individuals who report concerns in good faith, regardless of the outcome of the investigation.

**- False Allegations of Retaliation:**

- Making intentionally false or malicious claims of retaliation is a serious violation and may result in disciplinary action.

## 4.6. Support for Affected Individuals

**- Access to Support Services:**

- Individuals who have experienced retaliation may access support services, including:
- Counseling or employee assistance programs.
- Guidance from the Human Resources Department.

**- Restoration Measures:**

- If retaliation is substantiated, EAO will take steps to restore the affected individual's position, benefits, or status, as appropriate.

## 4.7. Communication and Awareness

**- Policy Dissemination:**

- Information about protection against retaliation will be included in training sessions and communicated regularly to all stakeholders.

**- Encouraging a Speak-Up Culture:**

- EAO promotes an organizational culture where reporting concerns and participating in investigations are encouraged and valued.

## 5. ROLES AND RESPONSIBILITIES

The successful implementation of the Whistleblowing Policy relies on the active participation and commitment of all individuals associated with EAO. This section delineates the specific roles and responsibilities of employees, managers, the Whistleblowing Officer, the Human Resources Department, and the Executive Director in upholding the policy's objectives.

### 5.1. Employees and Stakeholders

- **Primary Responsibility:**
  - All employees, volunteers, contractors, partners, suppliers, donors, beneficiaries, and other stakeholders are responsible for upholding EAO's ethical standards and policies.
- **Reporting Concerns:**
  - **Prompt Reporting:**
    - Responsible for reporting any genuine concerns about suspected or actual misconduct promptly through the appropriate channels.
  - **Good Faith Reporting:**
    - Ensure that reports are made in good faith, with a reasonable belief that the information disclosed indicates wrongdoing.
  - **Cooperation:**
    - Cooperate fully with any investigations by providing truthful and complete information.
- **Awareness and Compliance:**
  - **Policy Familiarity:**
    - Stay informed about EAO's Whistleblowing Policy and related policies.
  - **Ethical Conduct:**
    - Adhere to the organization's Code of Conduct and ethical guidelines in all activities.

### 5.2. Managers and Supervisors

- **Creating an Open Environment:**
  - **Foster Openness:**
    - Promote a workplace culture where employees feel comfortable raising concerns without fear of retaliation.
  - **Accessibility:**
    - Be approachable and available to discuss concerns confidentially.
- **Supporting Whistleblowers:**
  - **Protection:**
    - Ensure that whistleblowers are protected from retaliation or adverse treatment.
  - **Confidentiality:**
    - Maintain confidentiality of reports and the identity of the whistleblower, sharing information only on a need-to-know basis.
- **Addressing Concerns:**

- **Timely Action:**
  - Address concerns promptly and appropriately, following the procedures outlined in the policy.
- **Escalation:**
  - Refer serious or complex issues to the Whistleblowing Officer or appropriate department.
- **Role Modeling:**
  - **Ethical Leadership:**
    - Demonstrate ethical behavior and compliance with organizational policies, setting a positive example for others.

### 5.3. Whistleblowing Officer

- **Policy Oversight:**
  - **Implementation:**
    - Oversee the effective implementation of the Whistleblowing Policy throughout EAO.
  - **Monitoring:**
    - Monitor compliance with the policy and recommend improvements as needed.
- **Handling Reports:**
  - **Receiving Reports:**
    - Serve as the primary point of contact for whistleblowing reports.
  - **Assessment:**
    - Conduct preliminary assessments to determine the validity and scope of allegations.
  - **Investigation Coordination:**
    - Ensure that investigations are conducted fairly, impartially, and in a timely manner.
  - **Record Keeping:**
    - Maintain secure and confidential records of all reports and investigations.
- **Communication:**
  - **Feedback to Whistleblowers:**
    - Provide acknowledgments and updates to whistleblowers, where appropriate.
  - **Reporting to Leadership:**
    - Report findings and recommendations to the Executive Director or Board of Directors.
- **Training and Awareness:**
  - **Education:**
    - Develop and deliver training programs on the whistleblowing process and ethical conduct.
  - **Policy Updates:**
    - Review and update the policy periodically to reflect changes in laws, regulations, or organizational needs.

## 5.4. Human Resources Department

- **Employee Support:**
  - **Guidance:**
    - Provide support and advice to employees regarding the Whistleblowing Policy and reporting procedures.
  - **Resource Provision:**
    - Offer access to counseling or employee assistance programs for individuals affected by misconduct or retaliation.
- **Handling Employment Issues:**
  - **Investigation Assistance:**
    - Assist in investigations involving employee misconduct, ensuring compliance with employment laws and internal policies.
  - **Disciplinary Actions:**
    - Implement disciplinary measures as recommended following investigations, in accordance with HR policies.
- **Policy Enforcement:**
  - **Policy Communication:**
    - Ensure that all employees are informed about the Whistleblowing Policy during onboarding and through ongoing communication.
  - **Record Maintenance:**
    - Maintain personnel records related to reports and disciplinary actions securely and confidentially.

## 5.5. Executive Director

- **Leadership Commitment:**
  - **Ethical Culture:**
    - Champion a culture of integrity, transparency, and accountability within EAO.
  - **Policy Support:**
    - Endorse and support the Whistleblowing Policy, ensuring it receives the necessary resources and attention.
- **Oversight and Governance:**
  - **Policy Implementation:**
    - Ensure that the whistleblowing process functions effectively and aligns with EAO's mission and values.
  - **Resource Allocation:**
    - Allocate sufficient resources for training, awareness programs, and effective operation of the whistleblowing system.
- **Response to Reports:**
  - **Review of Findings:**
    - Review investigation reports and recommendations provided by the Whistleblowing Officer.

- **Decision Making:**
  - Make decisions on appropriate actions, including disciplinary measures or policy changes, based on investigation outcomes.
- **Reporting to the Board:**
  - **Transparency:**
    - Provide regular reports to the Board of Directors on the status of whistleblowing activities, significant cases, and trends.
  - **Strategic Guidance:**
    - Work with the Board to address systemic issues and improve organizational policies and practices.

## 5.6. Board of Directors (if applicable)

*(Note: If EAO has a Board of Directors, include this section.)*

- **Governance Oversight:**
  - **Policy Approval:**
    - Approve the Whistleblowing Policy and any significant amendments.
  - **Monitoring:**
    - Oversee the implementation of the policy and the organization's ethical standards.
- **Accountability:**
  - **Review Reports:**
    - Receive and review reports on whistleblowing activities from the Executive Director.
  - **Strategic Direction:**
    - Provide guidance on addressing systemic issues and enhancing the organization's ethical framework.

## 6. FALSE ALLEGATIONS

The effectiveness of EAO's Whistleblowing Policy relies on the integrity and honesty of individuals who report concerns. While the organization encourages the reporting of genuine concerns, it also recognizes the potential harm that can result from false or malicious allegations. This section outlines the organization's stance on good faith reporting and the repercussions for deliberate false reporting.

### 6.1. Good Faith Reporting

- **Encouragement of Reporting:**
  - **Supportive Environment:**
    - EAO strongly encourages all employees, volunteers, partners, and stakeholders to report any genuine concerns about suspected misconduct, unethical behavior, or violations of laws and organizational policies.
  - **Protection Under Policy:**
    - Reports made in good faith are protected under this policy, even if subsequent investigation finds the concerns to be unsubstantiated.
- **Definition of Good Faith:**
  - **Reasonable Belief:**
    - A report is considered to be made in good faith when the individual has a reasonable belief or suspicion that misconduct has occurred, based on the information available to them at the time.
  - **No Requirement of Proof:**
    - The whistleblower is not required to have conclusive evidence; reasonable grounds for suspicion are sufficient to make a report.
- **Protection for Good Faith Reporters:**
  - **Non-Retaliation Assurance:**
    - Individuals who report in good faith are protected from retaliation, as detailed in Section 4: Protection Against Retaliation.
  - **Confidentiality:**
    - The identity of the whistleblower and the details of the report will be kept confidential to the greatest extent possible.

### 6.2. Deliberate False Reporting

- **Zero Tolerance Policy:**
- **Serious Offense:**
  - EAO considers the deliberate reporting of false or malicious information to be a serious offense.
- **Undermining Integrity:**
  - Such actions undermine the effectiveness of the whistleblowing process and can harm innocent individuals and the organization's reputation.
- **Definition of Deliberate False Reporting:**

- **Knowingly False Information:**
  - A report is considered deliberately false when the individual knowingly provides information that is untrue or misleading.
- **Malicious Intent:**
  - The individual makes allegations with the intent to harm others, cause disruption, or gain personal advantage.
- **Consequences of Deliberate False Reporting:**
- **Disciplinary Action:**
  - Individuals found to have made deliberate false or malicious allegations will be subject to disciplinary action, which may include:
    - Verbal or written warnings.
    - Mandatory training or counseling.
    - Suspension or demotion.
    - Termination of employment or contractual relationship.
- **Legal Action:**
  - In cases where the false reporting constitutes a violation of law, EAO may refer the matter to legal authorities for further action.
- **Restitution:**
  - The individual may be required to compensate for any damages or losses incurred due to the false report.

## 6.3. Investigation of Allegations

- **Fair Assessment:**
  - **Impartial Investigation:**
    - All reports, including those suspected to be false, will be investigated thoroughly and impartially.
  - **Evidence-Based Approach:**
    - Investigations will focus on factual evidence to determine the validity of the allegations.
- **Rights of the Accused:**
  - **Presumption of Innocence:**
    - Individuals accused of misconduct are presumed innocent until proven otherwise.
  - **Confidentiality:**
    - The identity of the accused will be protected, and information will be shared only on a need-to-know basis.

## 6.4. Preventing False Allegations

- **Education and Training:**
  - **Awareness Programs:**
    - EAO will provide training to employees and stakeholders on ethical reporting and the importance of accuracy and honesty in making reports.



- **Understanding Policies:**
  - Clear communication of the Whistleblowing Policy and the consequences of false reporting will be emphasized during onboarding and regular training sessions.
- **Encouraging Responsible Reporting:**
  - **Guidance and Support:**
    - Individuals uncertain about the validity of their concerns are encouraged to seek guidance from the Whistleblowing Officer or Human Resources before making a formal report.
  - **Access to Information:**
    - Providing access to policies and procedures can help individuals make informed decisions about reporting.

## 6.5. Balancing Encouragement and Accountability

- **Maintaining Trust:**
  - **Integrity of the Process:**
    - By discouraging false allegations, EAO aims to maintain trust in the whistleblowing system and ensure that resources are focused on addressing genuine concerns.
  - **Protecting Individuals:**
    - Preventing false reports protects individuals from unwarranted harm to their reputation and well-being.
- **Promoting Ethical Culture:**
  - **Shared Responsibility:**
    - All members of the organization share the responsibility to promote honesty, integrity, and accountability.
  - **Reinforcing Values:**
    - Upholding these principles strengthens EAO's commitment to ethical conduct and fosters a positive organizational culture.

## 7. RECORD KEEPING

Effective record keeping is essential for maintaining the integrity of the whistleblowing process, ensuring transparency, and demonstrating compliance with legal and regulatory requirements. EAO is committed to securely storing all records associated with whistleblowing reports and investigations while protecting the confidentiality and privacy of all parties involved.

### 7.1. Purpose of Record Keeping

- **Accountability and Transparency:**
  - Provide a clear trail of actions taken in response to reports of misconduct.
  - Facilitate oversight and review by authorized personnel or external auditors.
- **Legal Compliance:**
  - Ensure adherence to data protection laws, regulations, and organizational policies.
  - Preserve evidence that may be required for legal proceedings or regulatory inquiries.
- **Continuous Improvement:**
  - Analyze data to identify patterns, trends, or systemic issues.
  - Inform policy revisions and training programs to enhance organizational practices.

### 7.2. Types of Records Maintained

- **Reporting Records:**
  - Initial reports of concerns or allegations, including details provided by the whistleblower.
  - Anonymized reports when the whistleblower chooses to remain anonymous.
- **Investigation Records:**
  - Investigation plans and methodologies.
  - Interview transcripts or summaries.
  - Collected evidence, such as documents, emails, photographs, or recordings.
  - Final investigation reports with findings and recommendations.
- **Communication Records:**
  - Correspondence with the whistleblower, including acknowledgments and feedback.
  - Notifications and communications with subjects of the investigation.
  - Internal communications among investigation team members.
- **Outcome and Action Records:**
  - Documentation of decisions made by management or the Board of Directors.
  - Records of disciplinary actions taken, if any.
  - Records of policy changes or corrective measures implemented.

## 7.3. Secure Storage

- **Physical Records:**
  - **Storage Facilities:**
    - Kept in locked cabinets or secure rooms with controlled access.
    - Located in areas with appropriate environmental controls to prevent damage.
  - **Labeling and Organization:**
    - Clearly labeled with unique identifiers.
    - Organized systematically for easy retrieval by authorized personnel.
- **Electronic Records:**
  - **Secure Servers:**
    - Stored on encrypted servers with robust cybersecurity measures.
    - Regular backups performed to prevent data loss.
  - **Access Controls:**
    - Protected by strong passwords and, where possible, multi-factor authentication.
    - Use of secure file transfer protocols for sharing sensitive information.
- **Data Protection Measures:**
  - **Encryption:**
    - Sensitive data encrypted both at rest and during transmission.
  - **Firewalls and Antivirus Software:**
    - Updated regularly to protect against unauthorized access and cyber threats.
  - **Regular Audits:**
    - Periodic security assessments to identify and address vulnerabilities.

## 7.4. Access Control

- **Authorized Personnel:**
  - Access limited to individuals directly involved in the investigation and oversight process, such as:
    - Whistleblowing Officer.
    - Assigned investigators.
    - Human Resources Manager (for employment-related issues).
    - Legal counsel, if applicable.
    - Executive Director or designated senior management.
  - **Need-to-Know Basis:**
    - Information shared only with those who require it to perform their duties.
- **Confidentiality Agreements:**
  - **Non-Disclosure Obligations:**
    - Authorized personnel required to sign confidentiality agreements.
    - Obligations extend beyond the duration of their involvement or employment.
- **Access Logs:**
  - **Monitoring Access:**

- Electronic systems maintain logs of who accesses records, when, and for what purpose.
- **Audit Trails:**
  - Regular reviews of access logs to detect and address any unauthorized access.

## 7.5. Retention Periods

- **Standard Retention:**
  - Records related to whistleblowing reports and investigations will be retained for a minimum of **specify number of years, e.g., five (5) years** from the conclusion of the investigation.
- **Legal Requirements:**
  - **Compliance with Laws:**
    - Retention periods may be extended to comply with legal obligations, such as statutes of limitations or ongoing legal proceedings.
  - **Litigation Holds:**
    - If litigation or regulatory action is anticipated, relevant records will be preserved until final resolution.
- **Destruction of Records:**
  - **Secure Disposal:**
    - Physical records shredded or incinerated.
    - Electronic records permanently deleted using secure methods.
  - **Documentation:**
    - Maintain records of destruction activities, including dates and methods used.

## 7.6. Data Privacy and Protection

- **Compliance with Data Protection Laws:**
  - Adhere to applicable data protection and privacy laws in all jurisdictions where EAO operates.
- **Rights of Individuals:**
  - **Access Requests:**
    - Individuals may request access to personal data held about them, subject to legal limitations.
  - **Correction of Data:**
    - Correct inaccuracies in personal data upon request.
- **Anonymization and Redaction:**
  - **Protecting Identities:**
    - Personal identifiers removed or redacted when records are used for analysis or reporting purposes.
  - **Aggregated Data:**
    - Use aggregated data to identify trends without disclosing individual identities.

## 7.7. Responsibility for Record Keeping

- **Whistleblowing Officer:**
  - **Custodian of Records:**
    - Responsible for maintaining and securing all records related to whistleblowing reports and investigations.
  - **Policy Compliance:**
    - Ensure that record-keeping practices comply with this policy and legal requirements.
- **Information Technology Department:**
  - **Technical Support:**
    - Provide and maintain secure electronic storage solutions.
    - Implement cybersecurity measures to protect electronic records.
- **Human Resources Department:**
  - **Personnel Records:**
    - Maintain records of disciplinary actions and employment-related documents resulting from investigations.
- **All Employees:**
  - **Confidentiality Obligations:**
    - Adhere to policies regarding the handling and protection of sensitive information.

## 7.8. Breach of Record-Keeping Protocols

- **Reporting Breaches:**
  - Any suspected or actual breaches of record-keeping protocols must be reported immediately to the Whistleblowing Officer or the Executive Director.
- **Investigation of Breaches:**
  - **Prompt Action:**
    - Investigate breaches promptly to assess impact and mitigate risks.
  - **Notification:**
    - Notify affected individuals and authorities as required by law.
- **Consequences of Breaches:**
  - **Disciplinary Action:**
    - Individuals responsible for breaches may face disciplinary measures, up to and including termination.
  - **Legal Action:**
    - EAO may pursue legal remedies if breaches result from unlawful activities.

## 7.9. Regular Review and Audit

- **Periodic Audits:**
  - Conduct regular audits of record-keeping practices to ensure compliance and identify areas for improvement.
- **Policy Updates:**
  - Review and update the Record Keeping section periodically to reflect changes in laws, regulations, or organizational needs.

## 8.COMMUNICATION AND TRAINING

Effective communication and training are essential to ensure that all employees, volunteers, partners, and stakeholders are aware of the Whistleblowing Policy and understand the procedures for reporting misconduct. EAO is committed to fostering a culture of transparency and accountability through continuous education and awareness campaigns.

### 8.1. Policy Distribution

- **Accessibility of the Policy:**
  - **Website and Intranet:**
    - The Whistleblowing Policy will be made readily available on the EAO website and internal intranet, ensuring easy access for employees, volunteers, and external stakeholders.
  - **Employee Handbooks:**
    - The policy will be included in the employee handbooks distributed to all staff during onboarding and regularly updated versions will be shared as necessary.
  - **Notice Boards:**
    - Summaries of the Whistleblowing Policy, including key reporting channels, will be posted on physical or digital notice boards in the workplace to ensure visibility.
  - **Translated Versions:**
    - The policy will be translated into relevant languages spoken by employees and stakeholders, ensuring accessibility to all.
- **Acknowledgment of Receipt:**
  - **Confirmation:**
    - All employees will be required to acknowledge receipt and understanding of the policy, either electronically or via signature, during onboarding and whenever significant updates are made.
  - **Periodic Updates:**
    - Updated versions of the policy will be distributed to all employees and stakeholders, with a requirement to acknowledge and review any changes.

### 8.2. Training Programs

- **Regular Training Sessions:**
  - **Initial Training:**
    - All employees and volunteers will receive mandatory training on the Whistleblowing Policy as part of their onboarding process. This training will cover:
      - The purpose and importance of whistleblowing.
      - How to report concerns through designated channels.
      - The protections available to whistleblowers, including protection from retaliation.
  - **Ongoing Training:**

- Periodic training sessions will be conducted to ensure that employees remain informed about their rights and responsibilities under the policy. These sessions will focus on:
  - Updates to the whistleblowing process or related policies.
  - Reinforcing ethical behavior and organizational values.
  - Case studies or examples of appropriate whistleblowing and the outcomes.
- **Targeted Training for Key Personnel:**
  - **Managers and Supervisors:**
    - Additional training will be provided for managers and supervisors to equip them with the knowledge and skills to handle whistleblowing reports appropriately and foster a supportive environment for reporting.
  - **Whistleblowing Officers and Investigators:**
    - Specialized training will be provided to personnel involved in the handling, investigation, and oversight of whistleblowing reports. This training will cover:
      - Conducting impartial and thorough investigations.
      - Maintaining confidentiality and protecting the rights of whistleblowers and accused individuals.
      - Documentation and reporting best practices.
- **Interactive and Engaging Formats:**
  - **Workshops and Webinars:**
    - Workshops and webinars will be offered to engage employees and address questions about the policy and procedures in real time.
  - **E-learning Modules:**
    - Online training modules with quizzes or assessments will be made available to allow employees to complete training at their own pace, ensuring flexibility in learning.

### 8.3. Awareness Campaigns

- **Periodic Awareness Initiatives:**
- **Ethical Conduct Campaigns:**
  - EAO will run periodic awareness campaigns to promote ethical conduct and the importance of whistleblowing as a tool for ensuring accountability. Campaigns may include:
    - Posters, banners, and digital content on the organization's ethical values and the importance of reporting misconduct.
    - Distribution of promotional materials (e.g., brochures, flyers) highlighting whistleblowing procedures.
- **Annual Ethics Week:**
  - An annual event focused on ethics and accountability will be organized, which will include presentations, workshops, and discussions on the Whistleblowing Policy and related topics such as anti-corruption, transparency, and conflict of interest.
- **Utilizing Internal Communication Channels:**
- **Email Newsletters:**

- Regular email updates or newsletters will include information on the Whistleblowing Policy, highlighting key features such as the reporting channels and protections available to whistleblowers.
- **Internal Forums and Meetings:**
  - Ethical conduct and the importance of reporting misconduct will be regularly discussed in team meetings, department briefings, and organization-wide forums.
- **Reinforcing the Policy During Critical Times:**
- **New Projects or Initiatives:**
  - At the start of significant projects, new partnerships, or key organizational changes, additional emphasis will be placed on the Whistleblowing Policy to ensure that employees are reminded of the proper channels for raising concerns.
- **During Organizational Challenges:**
  - If the organization faces periods of difficulty or heightened risk, such as during internal restructuring or in response to external scrutiny, additional communication efforts will be made to encourage the reporting of any observed misconduct.

## 8.4. Measuring Effectiveness of Communication and Training

- **Feedback Mechanisms:**
  - **Surveys and Assessments:**
    - EAO will conduct regular surveys and assessments to gather feedback on the effectiveness of training programs and awareness campaigns, ensuring that employees understand and feel confident in using the whistleblowing mechanisms.
  - **Training Evaluations:**
    - After each training session, employees will be asked to evaluate the content and delivery, providing insights on areas for improvement.
- **Monitoring Participation:**
  - **Training Attendance Records:**
    - Attendance at mandatory training sessions will be tracked, and follow-up sessions will be scheduled for any employees who miss initial training.
  - **Online Module Completion:**
    - For e-learning modules, completion rates will be monitored, and reminders sent to those who have not completed their training within the designated timeframe.

## 8.5. Continuous Improvement

- **Updating Communication Materials:**
  - Based on feedback and evolving organizational needs, EAO will regularly review and update communication materials, training content, and awareness strategies to ensure they remain relevant and effective.
- **Integration with Broader Ethical Initiatives:**
  - The whistleblowing policy will be integrated into broader organizational initiatives aimed at promoting ethical behavior, such as diversity and inclusion programs, anti-corruption policies, and leadership development.



## 9. REVIEW AND AMENDMENTS

To ensure the continued effectiveness and relevance of the Whistleblowing Policy, it is essential that the policy is periodically reviewed and updated to reflect changes in laws, regulations, and organizational needs. This section outlines the procedures for reviewing and amending the policy.

### 9.1. Periodic Review

- **Annual Review Process:**
  - **Scheduled Review:**
    - The Whistleblowing Policy will undergo a comprehensive review **annually** to evaluate its effectiveness in promoting ethical behavior, protecting whistleblowers, and ensuring compliance with legal requirements.
  - **Responsibility for Review:**
    - The review will be led by the **Whistleblowing Officer** in collaboration with the **Human Resources Department** and the **Executive Director**. External legal counsel or independent auditors may also be consulted as necessary.
  - **Evaluation Criteria:**
    - During the review process, the following will be evaluated:
      - Effectiveness of the reporting mechanisms.
      - Adherence to legal and regulatory requirements.
      - Feedback from employees and stakeholders on the clarity and accessibility of the policy.
      - Number and nature of whistleblowing reports received and their outcomes.
      - Instances of retaliation or concerns raised about the reporting process.
      - Any developments in laws, regulations, or best practices related to whistleblowing.
- **Special Reviews:**
  - **Trigger Events:**
    - In addition to the annual review, the policy will be reviewed whenever there are significant changes in:
      - Relevant laws or regulations.
      - Organizational structure or governance.
      - Incidents involving whistleblowing that indicate potential weaknesses in the policy.
      - Feedback from internal or external audits or assessments.
  - **Immediate Response:**
    - In the event of a legal or regulatory change, the policy will be updated as soon as possible to ensure compliance.

### 9.2. Amendments

- **Policy Amendment Process:**
  - **Recommendation for Changes:**

- Based on the findings from the periodic or special reviews, recommendations for amendments to the Whistleblowing Policy will be made by the **Whistleblowing Officer** and submitted to the **Executive Director** for review.
- **Approval by the Board of Directors:**
  - All proposed amendments must be submitted to and approved by the **EAO Board of Directors** before implementation. The Board will review the changes to ensure they align with the organization's strategic objectives and legal obligations.
- **Legal Compliance:**
  - Amendments will be checked for compliance with all relevant national and international laws, particularly those related to whistleblower protection, data privacy, and employment law.
- **Communication of Amendments:**
  - **Notification to Stakeholders:**
    - Once amendments are approved, they will be communicated to all employees, volunteers, partners, and stakeholders through the following channels:
    - **Email Notifications:**
      - A formal email will be sent to inform all relevant parties of the changes.
    - **Policy Distribution:**
      - The updated policy will be distributed electronically and/or in print and will be made available on the EAO website, intranet, and in employee handbooks.
    - **Training Sessions:**
      - If the amendments significantly alter the reporting process or whistleblower protections, additional training sessions or workshops will be organized to ensure that everyone understands the changes.
  - **Effective Date of Changes:**
    - The policy will specify the effective date of any amendments, allowing sufficient time for employees and stakeholders to become familiar with the updates.
- **Documenting Changes:**
  - **Version Control:**
    - Each version of the Whistleblowing Policy will include a version number and the date of the most recent amendment. A history of changes will be maintained to track all updates and revisions made over time.
  - **Archiving Previous Versions:**
    - Previous versions of the policy will be archived for reference and audit purposes, ensuring a clear record of how the policy has evolved.

## 10. CONTACT INFORMATION

EAO has established several channels to ensure that individuals can report concerns or misconduct confidentially and securely. Below are the key contact details for reporting concerns, seeking advice, and accessing support through the whistleblowing process.

### 10.1. Whistleblowing Officer

The Whistleblowing Officer is the designated person responsible for receiving and managing whistleblowing reports, ensuring investigations are conducted fairly and maintaining confidentiality.

- **Name:** Natnael Tlahun
- **Phone:** 0941705731
- **Email:** [whistleblower@eastaction.org](mailto:whistleblower@eastaction.org)
- **Office Address:** jigjig

### 10.2. Human Resources Department

The Human Resources Department provides support for employees and handles any employment-related issues arising from whistleblowing reports.

- **HR Manager:** Dhu Ahmed Abdullah
- **Phone:** 0915773851
- **Email:** [hr@eastaction.org](mailto:hr@eastaction.org)
- **Office Hours:** Insert Office Hours, e.g., Monday to Friday, 9:00 AM – 5:00 PM

### 10.3. Whistleblower Hotline

EAO offers a confidential 24/7 hotline for individuals to report concerns anonymously, if preferred.

- **Phone:** 1-800-555-0199
- **Availability:** 24 hours a day, 7 days a week
- **Languages Supported:** Insert languages if applicable

### 10.4. Online Reporting Portal

Individuals can submit reports via EAO's secure online whistleblowing portal.

- **Website:** [www.eao.org/whistleblowing](http://www.eao.org/whistleblowing)
- **Anonymity Option:** Users can choose to submit reports anonymously if desired.
- **Support Documents:** The portal allows the upload of supporting documents or evidence.