

WHISTLEBLOWING POLICY

Human Rights and Media Institute Foundation (IPCIM)

§ 1. Purpose and Definitions

The Whistleblowing Policy sets out the rules for reporting violations of law and ethical standards (irregularities) within the "Human Rights and Media Institute" Foundation (IPCIM) and ensures protection for reporting persons (whistleblowers).

Whistleblower is any person who in good faith reports information about a violation acquired in a work-related context within the Foundation.

Violation is any act or omission that is contrary to the law, the Foundation's Articles of Association, the Code of Ethics, or GDPR principles.

§ 2. Reporting Channels and Procedure

The Foundation provides an internal reporting channel for whistleblowers, managed by the Management Board, and in the event of a conflict of interest – by the Ethics Council (if established).

Reporting channel:

- **a) Email:** sygnalista@ipcim.org (protected address, accessible only to authorized persons).
- **b) Traditional mail:** Letter sent to the Foundation's registered address marked "*Confidential – Whistleblower*" ("Do rąk własnych – Sygnalista").

Reports may be submitted anonymously.

§ 3. Whistleblower Protection and Confidentiality

Absolute Prohibition of Retaliation: The Foundation guarantees that a Whistleblower reporting in good faith will not suffer any adverse consequences (e.g., dismissal, demotion, harassment), even if the report proves to be unsubstantiated, provided they acted without malicious intent.

Confidentiality of Identity: The identity of the Whistleblower and the person concerned by the report shall remain confidential and may only be disclosed on the basis of mandatory provisions of law (e.g., at the request of the prosecutor's office).

§ 4. Report Handling Procedure

Acknowledgment of Receipt: The Whistleblower shall receive confirmation of receipt within 7 days (if a contact address was provided).

Verification: The Management Board (or Ethics Council) shall immediately appoint a team to verify the report. Verification shall take place within 30 days.

Post-Verification Actions:

- **a) If the violation is confirmed:** taking appropriate corrective, disciplinary, or legal actions (in accordance with § 4 of the Code of Ethics).
- **b) If the violation is not confirmed:** closure and archiving of the case.

The Whistleblower shall be informed of the closure of the case or actions taken (provided it does not infringe upon third-party confidentiality).

§ 5. Final Provisions

The Policy enters into force on the day of its adoption by the Management Board of the Foundation.