

Syrian German Medical Association (SGMA)

Whistleblower Protection Policy

1. Purpose

The purpose of this policy is to encourage the reporting of wrongdoing, ensure that whistleblowers are protected from retaliation, and promote a culture of transparency and accountability within SGMA.

2. Scope

This policy applies to all SGMA personnel, including board members, employees, volunteers, consultants, contractors, and partner organizations.

3. Definition of Whistleblowing

Whistleblowing is the act of reporting suspected or actual wrongdoing, including but not limited to:

- Fraud, corruption, or theft,
- Misuse of SGMA funds or resources,
- Breaches of SGMA's Code of Conduct or policies,
- Abuse, exploitation, or harassment,
- Serious health and safety risks,
- Criminal activity or unethical conduct.

4. Rights of Whistleblowers

SGMA guarantees that:

- Whistleblowers will not face retaliation, including dismissal, harassment, discrimination, or threats,
- Reports can be made confidentially or anonymously,
- Good faith reports are protected even if not substantiated.

5. Reporting Channels

Reports can be made through the following secure channels:

- **Direct supervisor** (if appropriate),
 - **SGMA Compliance Officer** via secure email or phone,
 - **Anonymous digital reporting system** (when available),
 - **External legal or audit advisor** in exceptional cases.
- All reports are acknowledged within 7 days and handled with discretion.

6. Investigation Process

- The Compliance Officer conducts a preliminary assessment to determine admissibility,
- A full investigation is launched if warranted,
- Investigations are conducted independently, objectively, and confidentially,
- The whistleblower is informed of the outcome, subject to legal limits.

7. Confidentiality and Data Protection

- The identity of the whistleblower will be kept confidential unless legally required,
- All information is stored securely and access is restricted,

- Data handling complies with GDPR and SGMA's Data Protection Policy.

8. False Allegations

- Deliberate false reporting is a serious violation and may lead to disciplinary measures,
- Mistaken or unsubstantiated reports made in good faith are protected.

9. Support to Whistleblowers

- SGMA provides access to legal or psychological support where needed,
- Regular follow-up is conducted to ensure no retaliation occurs,
- Whistleblowers may request reassignment or anonymity protections.

10. Monitoring and Review

- The Governance and Ethics Committee oversees implementation,
- This policy is reviewed annually to reflect evolving best practices and legal standards,
- Feedback from whistleblowers is considered for policy improvement.

Approved by the SGMA Board of Directors on: 01.01.2025
To be reviewed annually by the Governance and Ethics Committee.