



hdri★
Human Development
Research Initiative

WHISTLEBLOWING / SPEAK-UP POLICY

Reporting Wrongdoing Safely and Without Fear of Retaliation

Adopted by the Board of Directors pursuant to Article 31 of the HDRI Statutes

Paris, France



Human Development Research Initiative (HDRI)

50 Rue des Tournelles, 75003 Paris, France

Registration Number: W751275674

EU TRN: 892689452279-12

info@hdevri.org | www.hdevri.org

PREAMBLE

An organisation can adopt every code and every policy it likes, but none of them mean anything unless a person who sees a genuine problem feels safe enough to say so. This Whistleblowing / Speak-Up Policy (the 'Policy') exists to give that assurance to everyone connected with the Human Development Research Initiative ('HDRI' or 'the Organisation'): if you raise a concern in good faith, you will be heard, and you will not be punished for it.

This Policy is adopted by the Board of Directors pursuant to Article 31 of HDRI's Statutes (the 'Statutes'), and gives detailed and specific effect to the reporting and anti-retaliation provisions already set out in general terms in Articles 26 and 27 of HDRI's Code of Conduct. It is drafted with express regard to French Law No. 2016-1691 of 9 December 2016 ('Loi Sapin II'), as amended by Law No. 2022-401 of 21 March 2022 transposing Directive (EU) 2019/1937 of the European Parliament and of the Council on the protection of persons who report breaches of Union law (the 'Whistleblower Protection Directive'), and by Decree No. 2022-1284 of 3 October 2022, which together establish the framework for whistleblower protection under French law.

This Policy applies that framework in a manner proportionate to HDRI's size as a youth-led civil society organisation, while ensuring that anyone who reports a genuine concern in good faith, a member, a Board member, a staff member, an intern, a volunteer, a partner, or a participant in an HDRI programme, has access to a clear channel for doing so and a guarantee of protection against retaliation.

This is the final and consolidated version of this Policy and supersedes any prior draft or informal statement of HDRI's whistleblowing arrangements.

Dialogue Research Development

Follow us: [Facebook](#), [Instagram](#), [LinkedIn](#)



TITLE I — GENERAL PROVISIONS

Article 1 — Purpose and Legal Basis

This Policy is adopted pursuant to Article 31 of the Statutes for the purpose of establishing a clear channel through which a concern about serious wrongdoing connected with HDRI can be reported, and of guaranteeing the protection of any person who makes such a report in good faith, in a manner consistent with Loi Sapin II, as amended, and Directive (EU) 2019/1937.

Article 2 — Definitions

For the purposes of this Policy: **‘whistleblower’** (lanceur d'alerte) means a natural person who reports or discloses, without direct financial compensation and in good faith, information concerning a crime, an offence, a threat or harm to the public interest, or a violation of a law, regulation, or applicable international commitment, of which that person became aware in a professional or associative context connected with HDRI; **‘protected disclosure’** means a report made in accordance with this Policy; **‘retaliation’** means any direct or indirect detrimental measure taken against a person on account of a protected disclosure they have made.

Article 3 — Scope of Application

This Policy may be used by any member, Board member, staff member, intern, research fellow, volunteer, external partner, or occasional collaborator of HDRI who has become aware, in that capacity, of information falling within Article 2. It covers concerns relating to financial irregularity, fraud, bribery or corruption, serious breaches of the Code of Conduct, safeguarding incidents, discrimination or harassment, breaches of data protection law, and any other serious violation of law or of HDRI's governing documents.

Article 4 — Relationship with the Code of Conduct

This Policy elaborates, and does not replace, Articles 26 and 27 of the Code of Conduct. A report that also falls within the scope of the Code of Conduct's general reporting channel may be made under either instrument, and shall in either case be handled with the full protections set out in this Policy.

TITLE II — PRINCIPLES

Article 5 — Good Faith, Not Certainty

A person making a report under this Policy is not required to be certain that their concern is well founded, nor to produce proof; it is sufficient that they have reasonable grounds to believe, at the time of the report, that the information reported is true. A report made in good faith is protected under this Policy even if a subsequent investigation does not substantiate it.



Article 6 — Confidentiality of Identity

The identity of a person making a report under this Policy, and the identity of any person named in the report, shall be kept confidential and disclosed only to those persons strictly necessary to receive, process, or investigate the report, save where disclosure is required by law or by a judicial authority, or is necessary to guarantee the rights of defence of a person implicated in the report.

Article 7 — Protection Against Retaliation

HDRI shall not tolerate any retaliation against a person who has made a protected disclosure under this Policy, including dismissal, non-renewal, demotion, exclusion, harassment, or any other detrimental treatment connected with the report. A person who retaliates against a whistleblower commits a serious breach of the Code of Conduct and is liable to the disciplinary measures set out in Article 29 of the Code of Conduct.

Article 8 — No Protection for Bad Faith or Knowingly False Reports

The protections of this Policy do not extend to a person who makes a report they know to be false, or who acts with the intention of causing harm rather than in the genuine, good-faith belief that the information reported is accurate. HDRI shall, however, presume good faith unless it has clear and specific grounds to conclude otherwise.

TITLE III — REPORTING CHANNELS AND PROCEDURE

Article 9 — Internal Reporting Channel

A person wishing to make a report under this Policy should, in the first instance, address it in writing to the Secretary General or, where the concern involves the Secretary General or the person otherwise considers it more appropriate, directly to the President, using the confidential channel maintained under Article 26 of the Code of Conduct. Where the report concerns the President, it shall be addressed to another Board member designated by the Board for this purpose.

Article 10 — Anonymous Reports

A report may be made anonymously. HDRI shall consider an anonymous report on its merits in the same manner as a report made openly, save that the practical scope of any resulting investigation, and HDRI's ability to provide feedback to the reporting person, may be more limited than in the case of an identified report.



Article 11 – Acknowledgement and Feedback

HDRI shall acknowledge receipt of a report within seven (7) working days of its receipt, save where the reporting person has expressly requested otherwise or where acknowledgement would compromise the confidentiality of their identity. HDRI shall provide the reporting person with feedback on the action taken or envisaged within a reasonable time not exceeding three (3) months from the acknowledgement of receipt, which period may be extended to six (6) months in a case of particular complexity, of which the reporting person shall be informed.

Article 12 – External Reporting Channels

Independently of the internal channel described in Article 9, a whistleblower may, in accordance with Loi Sapin II as amended, report directly to a competent external authority, including the Défenseur des droits, a professional order, an administrative or judicial authority, or a relevant European Union institution or body, in particular where the concern involves a risk to public safety or health, or where the whistleblower reasonably believes that internal reporting would expose them to a risk of retaliation or would not lead to an effective response.

Article 13 – Public Disclosure as a Last Resort

Public disclosure, including to the press, is available to a whistleblower under this Policy only as a measure of last resort, in accordance with Loi Sapin II as amended: where no action has been taken in response to a report made under Article 9 or Article 12 within the time limits referred to in those Articles, or in a case of imminent or manifest danger to the public interest, or where recourse to an external authority would itself expose the whistleblower to a risk of retaliation or would not permit the effective handling of the report.

TITLE IV – INVESTIGATION AND ENFORCEMENT

Article 14 – Investigation

A report received under this Policy is investigated in accordance with the procedure set out in Article 28 of the Code of Conduct, adapted as necessary to preserve the confidentiality of the whistleblower's identity throughout the process.

Article 15 – Access to the File and Rights of Defence

A person implicated in a report shall be informed of the allegation against them at a stage of the investigation that does not compromise the gathering of evidence or the confidentiality of the whistleblower's identity, and shall have the opportunity to respond, in accordance with Article 30 of the Code of Conduct.



Article 16 – Record-Keeping

A record of each report made under this Policy, and of the action taken in response, shall be kept in a secure and restricted-access manner by the Secretary General, for a period consistent with HDRI's Archiving and Institutional Memory Policy and its obligations under applicable data protection law, and in any event for no longer than necessary to comply with those obligations or to defend HDRI's legal position in relation to the report.

Article 17 – Referral to the Competent Authorities

Where a report reveals conduct that may constitute a criminal offence, HDRI's handling of the matter under this Policy is without prejudice to any person's right, or the Board's own discretion, to refer the matter to the competent judicial, administrative, or regulatory authorities, including the relevant authority for suspected money laundering or financing of terrorism.

TITLE V – FINAL PROVISIONS

Article 18 – Publicity of this Policy

This Policy, and the means of accessing the reporting channel described in Article 9, shall be made known to all members, Board members, staff, interns, volunteers, and, so far as practicable, to partners and participants in HDRI's programmes.

Article 19 – Annual Review

The Board shall review the functioning of this Policy at least once a year, having regard to any report received, the timeliness of the responses given, and any measure required to strengthen the effectiveness of the reporting channel.

Article 20 – Amendment

This Policy may be adopted, amended, or repealed at any time by a simple majority decision of the Board, in accordance with Article 31 of the Statutes, and any amendment shall be communicated to all members within fifteen (15) days.

Article 21 – Entry into Force

This Policy enters into force upon its adoption by the Board of Directors and remains in force, as amended from time to time, until repealed by a subsequent decision of the Board.



Human Development Research Initiative (HDRI)

50 Rue des Tournelles, 75003 Paris, France

Registration Number: W751275674

EU TRN: 892689452279-12

info@hdevri.org | www.hdevri.org

ADOPTION

This Whistleblowing / Speak-Up Policy, comprising Five Titles and Twenty-One Articles, was duly adopted by the Board of Directors of the Human Development Research Initiative (HDRI) at a duly convened meeting, pursuant to Article 31 of the Statutes, and constitutes, from the date of its adoption, the Organisation's sole and complete policy on the matters it addresses.

Gurgen Petrosyan

President of HDRI

Date: 11 September 2026

Signature:

Sofia Balas

Secretary General

Date: 11 September 2026

Signature:

Dialogue Research Development

Follow us: [Facebook](#), [Instagram](#), [LinkedIn](#)