



Whistleblower Policy and Implementation

Addressing and preventing risks in a digitalized world

Secure whistleblower line at a glance

Providing individuals with means to report suspicious activity in a secure way. It is considered as an essential part of an anti-fraud program.

Increase in the identified fraud cases !.

Raise awareness on none-fraud related wrong doings such as workplace bullying, harassment.

Fraud losses were 50% smaller reported at organizations with hotlines and whistleblower platforms than those without.

Transparency International 2016

ACFE 2018 Report to the Nations Survey

How is occupational fraud initially detected?

40%

Tip

Employee

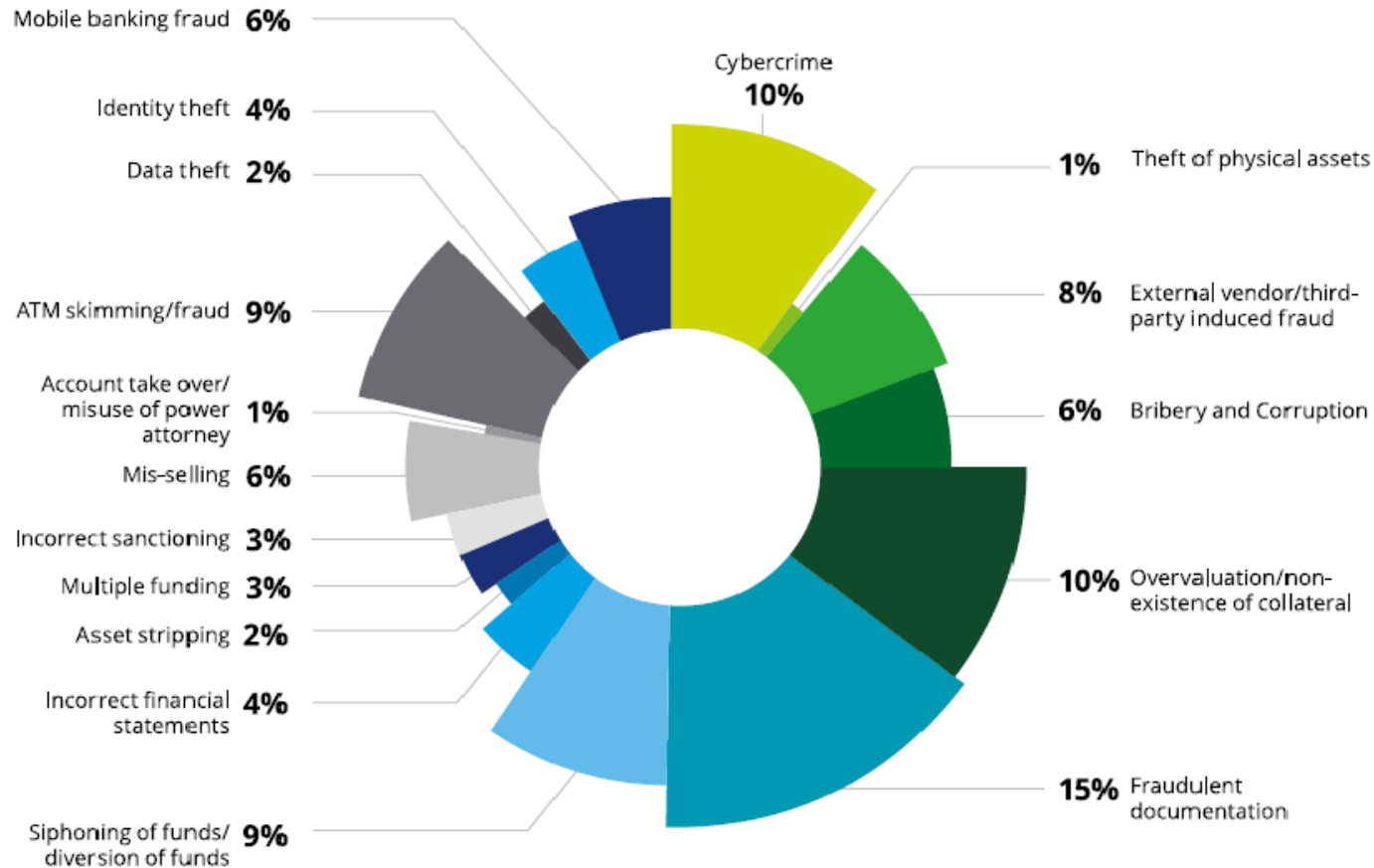
53%

Who reports occupational fraud?

- **95%** of employers agree that it is in the interests of their organization or industry sector for people to speak up about wrongdoing
- **66%** of employers said they had no procedures or policies in place with respect to whistleblowing

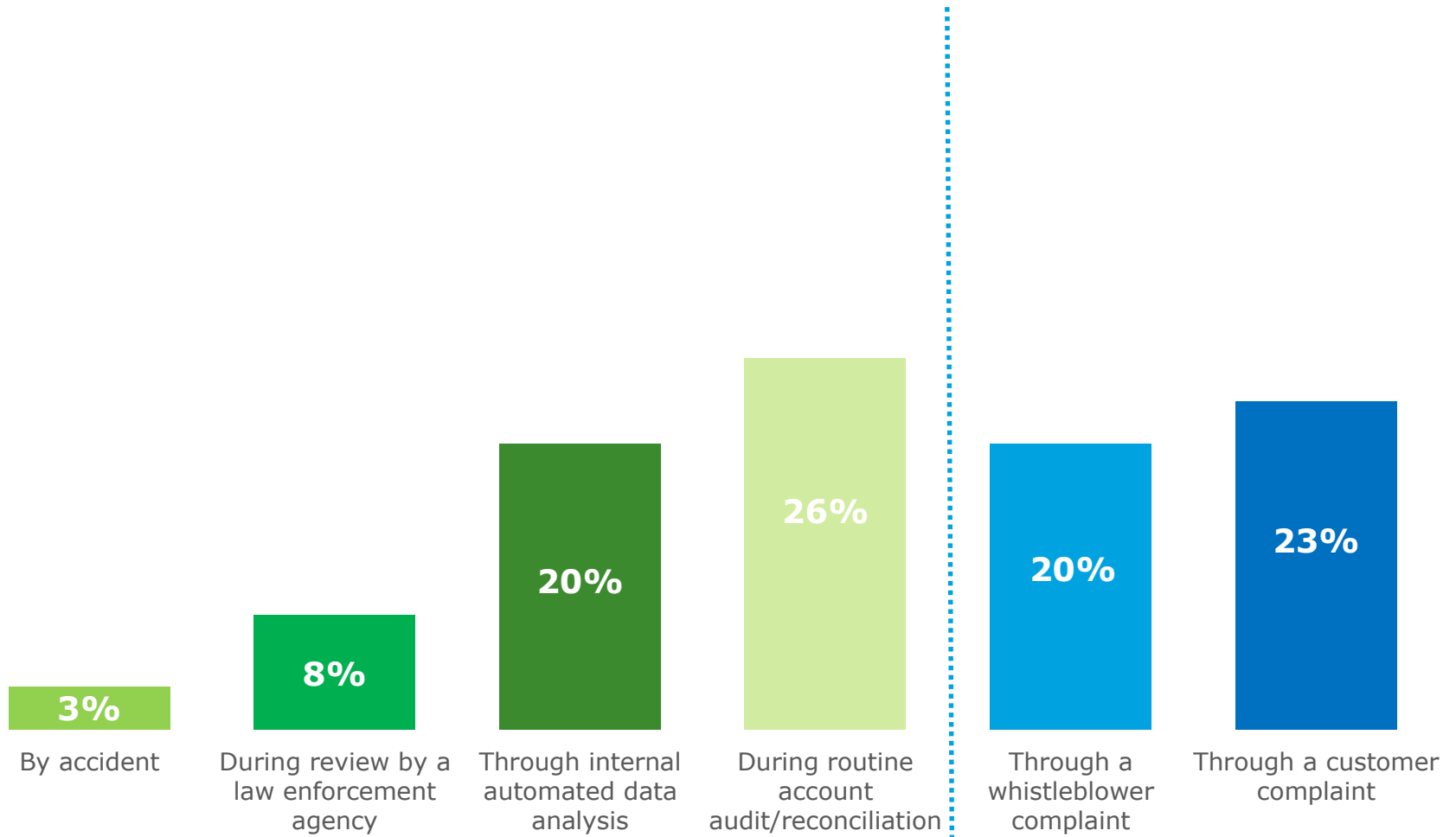
Types of fraud experienced by banks

Below are all of the varying types of fraud that banks are exposed to, according to a Deloitte Banking Fraud survey conducted in 2018. In this respect, the existence of a reporting mechanism such as a whistleblower platform can be crucial in detecting fraud and in determining the outcome of the case.



How are fraud incidents typically detected in your bank?

According to the same Deloitte survey, whistleblowing plays a significant part in fraud detection within banks.



Legal framework for whistleblowing

The new directive by the EU Council

In 2018 the EU Council has proposed a new EU directive to protect whistleblowers who report EU law breaches. Once the directive will become effective, it will be applicable to all EU members.

The proposal aims to:

1. Protect whistleblowers from retaliation in all forms;

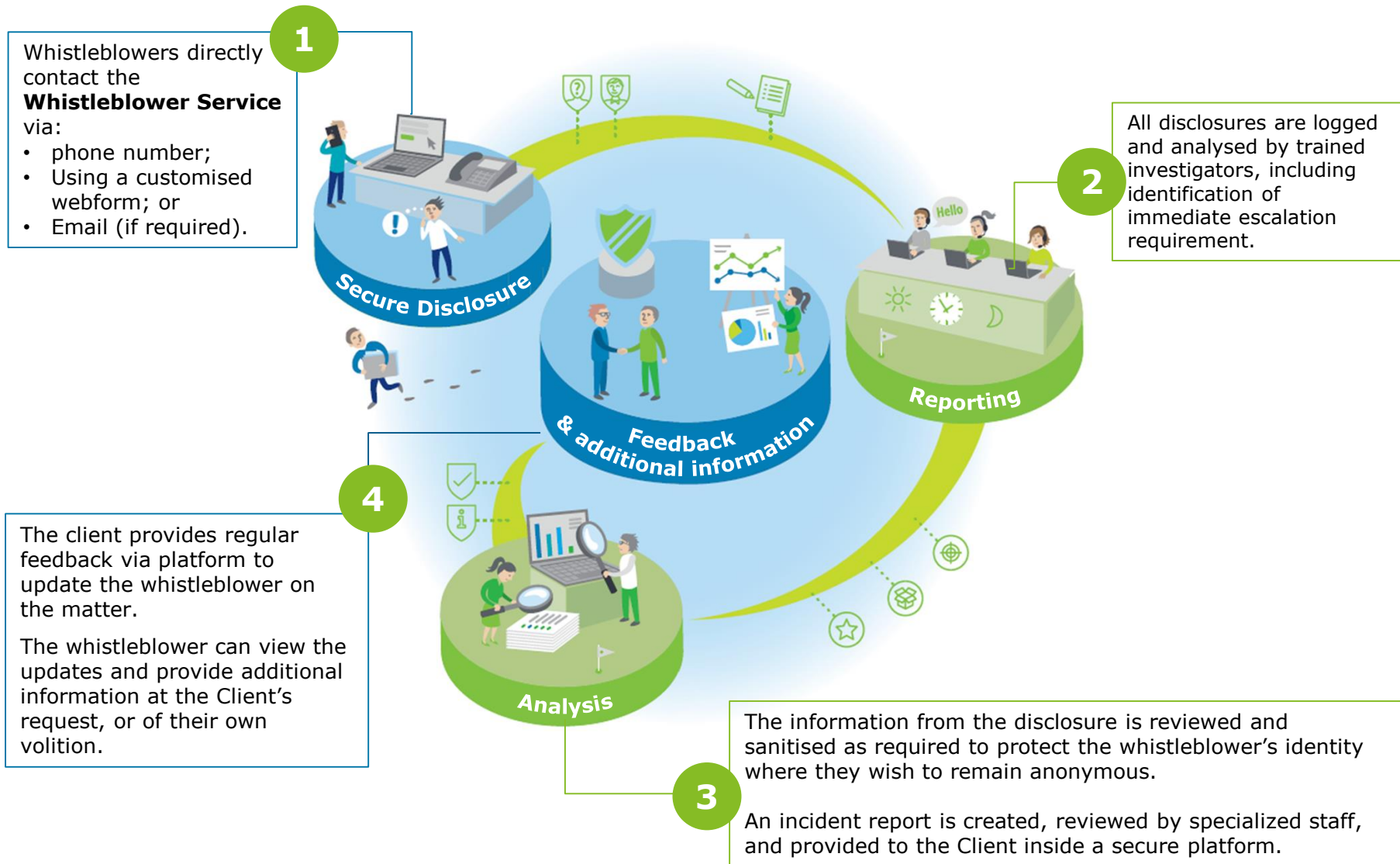
2. Oblige private, **mid-size firms** to set up formal processes for internal breach-reporting



“mid-size” is defined as firms with 50+ employees or €10+ million in annual turnover or total assets (possible exclusions include private entities with fewer than 250 employees or an annual turnover under €50 million)

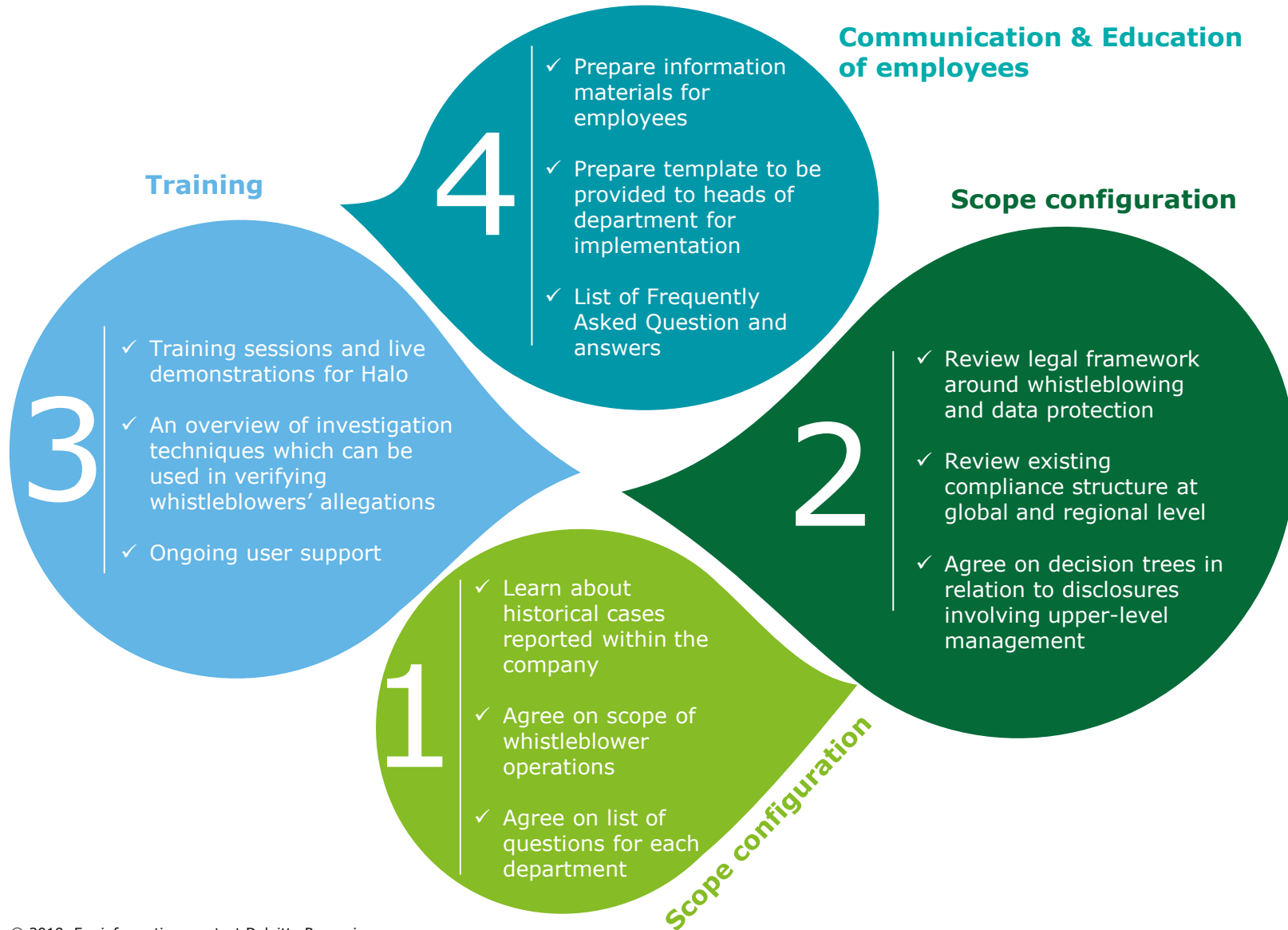
Blowing the whistle

How does it work?



Implementing a successful whistleblower solution

Enhance your broader compliance program





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