



Whistleblowing and Anti-retaliation Policy



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[IUCN](#)

Rue Mauverney 28
1196 Gland, Switzerland
Tel: +41 2999 0001
Fax: +41 22 999 002

Whistleblowing and Anti-retaliation Policy

Owner	Oversight Unit
Last approved review	New
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Approved by	Director General
Applicable to	All IUCN Staff Members world-wide
Purpose	The Whistleblowing and Anti-Retaliation Policy aims to support IUCN to ensure safe reporting mechanisms to IUCN Secretariat Staff Members and stakeholders. It also aims at providing protection and a safe working environment to IUCN Staff Members and stakeholders who raise concerns in good faith.
Related Policies, Procedures & Guidelines	<ul style="list-style-type: none"> • Code of Conduct and Professional Ethics (2023) • Staff Rules (2018) • Anti-Fraud and Anti-Corruption Policy (2023) • Policy on the Protection from Sexual Exploitation, Sexual Abuse, and Sexual Harassment (2019) • Policy on Procurement of Good and Services (2021) • IUCN Investigation Procedure (2023) • Guide for IUCN Secretariat Staff on Disclosing Conflict of Interest (2018)
Source language	English
Published in French under the title	
Published in Spanish under the title	
Language disclaimer	The original language of this policy is English; French and Spanish translations provided are approximate versions, and in the event of discrepancies, the English version shall prevail.
Contact	Oversight Unit



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1. INTRODUCTION

The International Union for Conservation of Nature and Natural Resources (“IUCN” or the “Organization”) is committed to the highest standards of accountability and transparency and to ensuring that its operations and resources are managed efficiently, ethically and lawfully, while striving to achieve the desired impact.

In accordance with IUCN Core Ethical Values, the Organization is also committed to fostering a diverse, inclusive, fair and safe working environment and a work culture, where individuals are encouraged to speak up against improper conduct. IUCN Staff and partners come from different backgrounds, cultures, and experiences. An important element of accountability and transparency is the ability for individuals, including but not limited to IUCN Staff, to report their concerns about unlawful or unethical conduct in a responsible and effective way without fear of retaliation.

2. PURPOSE

The purpose of the Whistleblowing and Anti-retaliation Policy (the “Policy”) is to assist and enable individuals or entities to report reasonably held suspicions of ethical misconduct so that IUCN can address and correct improper conduct and protect those who report such concerns from retaliation. The protections under this Policy extend also to individuals who engage in any protected activity as defined under this Policy

The Policy also aims to support IUCN to:

- a. Ensure a safe working and cooperation environment within IUCN as well as in the context of activities financed, administered, or supported by IUCN (also referred to as “projects”).
- b. Be recognized as a trusted organization;
- c. Ensure compliance with its internal regulations as well as applicable laws and regulations;
- d. Ensure that management are alerted of material issues not captured by other controls;
- e. Prevent financial losses; and
- f. Protect the integrity and reputation of the Organization.

3. SCOPE

This Policy allows the following persons or entities to report concerns of wrongdoings or suspected violations of IUCN’s rules, policies or procedures or of applicable local laws (hereinafter referred to for the purpose of this Policy as: “suspicions of ethical misconduct”) :

Whistleblower	Witness (saw a wrongdoing)	Victim (directly affected by a wrongdoing)
All IUCN Staff, temporary staff, long-term consultants, trainees, interns, and students (“Staff” or “Staff members”)	Duty to report any possible or actual wrongdoing related to IUCN work and activities.	Duty to report any possible or actual wrongdoing related to IUCN work and activities.
Third parties, including but not limited to consultants, contractors, vendors, representatives, and external	Duty to report any possible or actual wrongdoing related to IUCN work and activities.	Duty to report any possible or actual wrongdoing related to IUCN work and activities.

partners and their staff members		
Any Council Member or any Member of one of IUCN’s Commissions	Duty to report possible or actual wrongdoing perpetrated by an IUCN Staff member.	Duty to report possible or actual wrongdoing perpetrated by an IUCN Staff member.
Individuals, not employed or contracted, or not yet employed or contracted by IUCN	Duty to report possible or actual wrongdoing during a recruitment process, procurement process or any other pre-contractual negotiation.	Duty to report possible or actual wrongdoing during a recruitment process, procurement process or any other pre-contractual negotiation.

The anti-retaliation policy protects all internal and external stakeholders who bring forward a suspicion of ethical misconduct per the channels outlined below from retaliation.

4. MATERIAL SCOPE

Concerns may arise from an actual or suspected violation of applicable national and/or international laws, contractual provisions and/or relevant IUCN internal regulations.

Such concerns comprise, but are not limited to actual or suspected:

- a. Violation of human rights of any kind,
- b. Discrimination against any Staff Member or Stakeholder,
- c. Sexual exploitation and abuse,
- d. Harassment or bullying,
- e. Undue breach of confidentiality or privacy,
- f. Money laundering or terrorism financing,
- g. Accounting, internal controls or auditing matters,
- h. Asset misappropriation,
- i. Failure to disclose conflict of interests,
- j. Fraud,
- k. Bribery and corruption, or
- l. Breach of any legal or contractual provisions that may put IUCN at risk
- m. Potential risks covered by the IUCN ESMS policy in the context of project design and implementation such as (but not limited to): failure to respect procedural rights (lack of consultation or disclosure), discrimination, unjustified preferential treatment with regards to access to project resources/ benefits, potential or actual adverse E&S impacts (on indigenous peoples, cultural heritage, biodiversity/ecosystem services, peoples’ access to livelihood resources, working conditions and occupational health and safety of project workers, communities’ health, safety and security, gender-based violence).

5. POLICY STATEMENT

5.1. Reporting obligations

Staff should be risk aware and have a duty to report actual or possible violations of IUCN’s rules, policies, or procedures and/or of applicable local laws that come to their attention to help protect the people potentially affected, as well as IUCN and its resources.

5.1.1. Reporting A Suspicion of Ethical Misconduct

As a matter of principle, suspicions of ethical misconduct shall be addressed, in first place, to the relevant Line Manager or Contact Person as defined in the glossary. Within twenty (20) working days, the relevant Line Manager or Contact Person shall:

- a. Endeavor to resolve the suspicion of ethical misconduct to the satisfaction of the Whistleblower and in the interest of IUCN, and
- b. Report the details of the suspicion of ethical misconduct, action taken and outcome to the attention of the Oversight Unit.

Where deemed necessary and without prejudice, reported suspicions of ethical misconduct may be escalated by the relevant Line Manager or Contact Person to the Oversight Unit.

5.1.2. Reporting A Suspicion of Ethical Misconduct in Projects

As outlined in the Guidance Note on ESMS Grievance Mechanism, the Contact Person to report suspicion of ethical misconduct in projects in which IUCN is engaged is first the Project Management Unit, then IUCN Contact Person in the concerned IUCN Office.

5.1.3. Escalation of a Suspicion of Ethical Misconduct

Staff Members or Stakeholders are entitled to escalate, in good faith, their suspicion of ethical misconduct to the Oversight Unit, in the following instances:

- a. If the allegations are against the Line Manager or Contact Person,
- b. If they feel uncomfortable reporting through the relevant Line Manager or Contact Person,
- c. In the absence of any suitable response from the relevant Line Manager or Contact Person within twenty (20) working days from the initial report
- d. If they are not satisfied with the response from the Relevant Line Manager or Contact Person, or
- e. If the agreed actions have not been properly implemented.

Concerns escalated to the Head Oversight Unit shall be transmitted through the Whistleblowing Platform, as follows:

- a. Confidential hotline (voice mail): +41 22 999 03 50, or
- b. Confidential mailbox: ethics@iucn.org

5.1.4. Anonymous reports

Anonymous reports of suspicions of ethical misconduct are accepted through the Whistleblowing Platform.

The preliminary assessment of the reported suspicion of ethical misconduct will only be undertaken if sufficient factual information is provided by the anonymous Whistleblower.

5.1.5. Filing a concern report

- Concern reports shall:
 - a. Be factual,
 - b. Not be malicious,
 - c. Not be speculative, conclusive, or judgemental, and

- d. Provide all available information to allow for the appropriate assessment of the nature, extent and urgency of the necessary inquiries and other procedures, in particular:
 - i. The nature of the Concern as well as its chronology,
 - ii. The list of the persons involved and their respective roles,
 - iii. The list of available evidence, and
 - iv. The summary of the actions/communications undertaken/made to date and their outcome.
- Concern reports are communicated in any of the IUCN official languages:
 - a. English,
 - b. French, or
 - c. Spanish.

The protection against retaliation as outlined in this Policy cannot be granted to the Whistleblower in case of anonymous report, until disclosure of their identity.

5.1.6. Conflict of Interest

If the reported concerns relate to allegations of ethical misconduct or wrongdoing by the Deputy Director Generals or the Oversight Head, the Whistleblower shall report them to the Director General who will decide on the appropriate course of action.

If the reported concerns relate to allegations of ethical misconduct or wrongdoing by the Director General, the Whistleblower shall report them to the Head of the Oversight Unit who will escalate them to the President of IUCN Council who will decide on the appropriate course of action.

Any Staff Member involved in the processing and/or an investigation of a reported concern, who may have an actual, potential or perceived conflict of interest with it, shall immediately recuse his/herself.

5.1.7. Reporting in good faith

Reports should be made as soon as possible after the relevant event(s) have become known. Reports should be factual and contain as much information as possible to allow for a proper assessment of the nature, extent, and urgency of the matter.

All suspicion of ethical misconduct filed must be in good faith. Anyone who files a complaint that is known to be false or malicious, or with a reckless disregard for the truth of the statements made, may be subject to administrative or disciplinary action.

5.2. Protection against Retaliation

IUCN does not tolerate any form of retaliation. Appropriate measures are in place to protect from reprisal anyone who reports wrongdoings and makes a good faith report on any suspicions of ethical misconduct. In addition, interim measures may be put in place per 5.4 below.

Retaliation may include, but is not limited to, the following actions taken without legitimate reason or justification against any of the above-mentioned individuals:

- a. Suspension, lay-off, dismissal or equivalent measures,
- b. Demotion or withholding of promotion,
- c. Transfer of duties, frequent and undesirable relocations, undesirable transfer, or reassignment,
- d. Reduction in wages, change in working hours,

- e. Withholding of training,
- f. Negative performance assessment or employment reference,
- g. Unjustified letters of reprimand,
- h. Denial of adequate resources to perform duties in accordance with his/her job description,
- i. Failure to assign meaningful work in accordance with his/her job description,
- j. Imposition or administering of any disciplinary measure, reprimand, or other penalty, including a financial penalty,
- k. Coercion, intimidation, harassment, or ostracism,
- l. Discrimination, disadvantageous or unfair treatment,
- m. Failure to convert a temporary employment contract into a permanent one, where the involved Staff Member had legitimate expectations that he or she would be offered permanent employment,
- n. Early termination of a temporary employment contract,
- o. Early termination or cancellation of a contract for goods or services,
- p. Systematic exclusion from relevant tender processes,
- q. Harm, including to the person's reputation, particularly in social media, or financial loss, including loss of business and loss of income,
- r. Blacklisting, which may entail that the involved Staff Member or Stakeholder will not, in the future, find employment or execute any other forms of contract in a similar sector, or
- s. Endorsing or otherwise condoning hostile conduct by another Staff Member or Stakeholder.

5.3. Retaliation Complaints

Staff or stakeholders who have reasonable grounds to believe that retaliation has been taken against them, or will be taken against them, for having engaged in a protected activity may seek redress by submitting a retaliation complaint to the Oversight Unit through the Whistleblowing Platform.

A retaliation complaint must be submitted as soon as possible and normally no later than six months of the adverse action or decision complained of so that appropriate action may be taken. The submission must include all relevant information and documentation available to support the retaliation complaint.

Oversight will acknowledge receipt of the retaliation complaints normally within ten working days of receipt and will provide its assessment or feedback on the complaint normally within three calendar months of its submission.

Whether an adverse action is retaliatory will depend on whether the action would have been taken for separate and legitimate reasons even in the absence of the protected activity. If not, the action would generally be considered as having been motivated by retaliation.

5.4. Interim measures

Pending the completion of an assessment of the retaliation complaint and without prejudice to its outcome, the Oversight Head may recommend to the Director General or its delegate interim measures or remedial action to protect the complainant while the review is pending, including but not limited to:

- a. Temporary suspension of the implementation of the action reported as retaliatory;
- b. Temporary or definitive transfer in terms of manager, job functions, structure or location, as and if feasible;

- c. Instructions to work remotely for a defined time period; and / or
- d. A request to take annual or special leave.

When the retaliation complaint or the interim measures involve IUCN staff members, the Oversight Unit will determine the course of action in consultation with the Chief Human Resources Officer and the Legal Adviser and ensure that possible measures are compliant with the applicable laws and conditions of employment.

Interim measures may be requested by the complainant in their written submission.

5.5. General behavioural rules and obligations

Whistleblowers, involved Staff Members and Stakeholders are obliged to:

- a. Provide all relevant information related to the reported Concerns and to remain available to the Head Oversight Unit in the event of an investigation into such Concerns, and
- b. Comply with confidentiality in case of involvement in an investigation into reported suspicions of ethical misconduct.

Whistleblowers, involved Staff Members or Stakeholders are prohibited from:

- a. Contacting the alleged perpetrator to get facts or request restitution;
- b. Personally, investigating into reported Concerns or conducting interviews;
- c. Attempting to discover the identity of a Whistleblower; and or
- d. Discussing or disclosing the facts and/or allegations relating to a Concern with anyone inside or outside the Organization, other than those to whom the Concern has been reported in accordance with the Policy.

5.6. Notification to the Whistleblower

As a matter of principle, each reported Concern shall be addressed and answered. For Concerns reported through the Whistleblowing Platform, the Oversight Unit must, within seven (7) working days:

- a. Acknowledge receipt of the reported Concerns and its registration in the Whistleblowing Database;
- b. Provide the Whistleblower with the case reference number; and
- c. Explain the immediate next steps.

Whistleblowers are entitled to receive feedback about the outcome of the suspicions of ethical misconduct they reported, as follows:

- a. Where applicable, the requalification of the case as a complaint pertaining to labour law matters or personal grievance of a Staff Member, or
- b. Without prejudice to confidentiality and personal data protection rules applicable to the persons affected by the reported suspicion of ethical misconduct, the decision(s) made and action(s) taken to conclude the procedure.

5.7. Records keeping and confidentiality

The data of all individuals affected by a reported suspicion of ethical misconduct, including a possible act of retaliation, are recorded, processed, retained, and destroyed in accordance with applicable laws and in full confidentiality.

All individuals affected by a reported suspicion of ethical misconduct, must be directly provided with a written specific data protection notice as soon as practically possible.

Without prejudice to retention requirements provided by other IUCN internal regulations, the retention periods of records relating to reported Concerns shall be of five (5) years from the date of completion of their investigation. The retention periods outlined above may be extended in case of evidence or suspicion of retaliation.

In case of criminal proceedings, the Organization shall comply with instructions of the relevant law enforcement authorities.

5.8. Investigation guiding principles

The investigations into reported Concerns shall be conducted in accordance with the guiding principles outlined in Appendix B “IUCN Investigation Procedure”.

6. ROLES AND RESPONSIBILITIES

6.1. Staff members and stakeholders

- a. Report in good faith any suspicion, allegation or evidence of a suspicions of ethical misconduct, whether they have experienced or witnessed the behaviour;
- b. Cooperate with investigations following such a report, while maintaining and respecting confidentiality; and
- c. Participate in ethics trainings and supporting IUCN in awareness-raising campaigns for third parties, project participants, and local communities.

6.2. Management

- a. Demonstrate personal compliance with this Policy;
- b. Build and promote an ethical organizational culture and lead by example;
- c. Ensure that all Staff have access to, are familiar with, and know their responsibilities pursuant to this Policy;
- d. Ensure that all members of the Office, Centre or Units leadership team are fully trained and briefed on this Policy and receive support and guidance on its implementation in their operations;
- e. Ensure that all Staff receive regular updates and training about this Policy and its application;
- f. Take decisive action concerning any breach of this Policy as warranted by the circumstances; and
- g. Protect individuals who report suspicions of ethical misconduct in good faith from retaliation.

6.3. Executive Board

- a. Champion an ethical organizational culture by actively embracing this Policy, setting the tone, and leading by example;

- b. Ensure that all Staff have access to, are familiar with and understand their responsibility pursuant to this Policy; and
- c. Ensure that IUCN Offices, Centres and Units under their supervision implement this Policy; and
- d. Provide oversight for compliance with this Policy.

6.4. Director General

- a. Setting up the “tone from the top” and ensuring that all Line Managers and Contact Persons do the same;
- b. Ensure that the responsibilities to implement and execute the Policy are clearly allocated;
- c. Hold all those responsible accountable; and
- d. Ensure that no retaliatory action is taken against a Staff Member involved in the reporting or the investigation of a reported allegation of ethical misconduct and wrongdoing.

6.5. Deputy Director General, Corporate Services

- a. Deciding on the adequate disciplinary or legal actions against the perpetrators, where necessary with the assistance of the Legal Adviser and of the Chief HR Officer; and
- b. Disclosing criminal conducts to the relevant law enforcement authorities, with the assistance of the Legal Adviser.

6.6. The Oversight Unit and Head of Oversight

- a. Be responsible for the implementation of this Policy;
- b. Ensure a timely acknowledgement of receipt (no later than ten days) of a complaint received via the Whistleblowing hotline;
- c. Ensure complaints are investigated where appropriate to do so, in line with relevant procedures;
- d. Ensure investigations are carried out; and
- e. Provide annual reports to the Director General and the Finance and Audit Committee outlining the activity carried out in relation to the Policy during the relevant period as well as the action taken.

6.7. The Chief Human Resources Officer

- a. Lead and provide input on human resource matters covered by this Policy;
- b. Investigate or oversee investigations into allegations of ethical misconduct or wrongdoing related to employees and workplace safety and protection;
- c. Together with the Head Oversight Unit, assesses risks and/or complaints of retaliation; and
- d. Provides recommendations on disciplinary actions and protective measures.

6.8. The Legal Advisor

- a. Provide guidance to the Director General, the Deputy Director General Corporate Services, and the Head Oversight Unit on:
 - I. The course of action to be taken, the involvement of external experts or law enforcement authorities, and the conduct of investigations;
 - II. The potential legal avenues or consequences once a Concern has been established through investigation, and the means available to restore IUCN reputation and integrity.
 - III. The Legal Adviser communicates with, manages and/or coordinates the follow up with

external legal counsels and relevant law enforcement authorities.

7. COMPLIANCE

Compliance with this Policy is mandatory. No waiver from this Policy can be provided. Non-compliance to this Policy would constitute ethical misconduct under the Code of Conduct and Professional Ethics and be subject to appropriate disciplinary measures.

8. GLOSSARY AND DEFINITIONS

Abuse of authority:	The improper use of a position of influence, power or authority by an individual towards others, whether through a one-time incident or series of incidents. It is particularly serious when the alleged offender uses influence, power or authority to improperly influence the career or employment conditions of another, e.g., through decisions on assignments, contract renewal, performance evaluation or promotion.
Bribery:	<p>“Bribery” or “bribe” means to directly or indirectly offer, promise, or provide a financial or other advantage (including hospitality or gifts and other expressions of appreciation in excess of a de minimus value) to another person or receive such an advantage in order to:</p> <ul style="list-style-type: none"> • Induce or encourage the recipient to perform a function improperly; • Induce or encourage the recipient to expedite the performance of a routine government action; or • Reward the recipient for the improper performance of a function.
Bullying:	Repeated offensive, cruel, intimidating, insulting or humiliating behaviour that undermines an individual or a group of individuals. Bullying may be physical, verbal, visual or written.
Confidential information:	All information disclosed, conveyed or otherwise made accessible to a Staff Member, either directly or indirectly, in any form, whether in writing, oral, visual, electronic or otherwise, that is designated “confidential”, or that the Staff knows, or has reason to know, is confidential or sensitive or not generally available to the public, including the fact that such information has been delivered to IUCN or the Staff. It includes, but is not limited to, records relating to internal deliberative processes, such as internal notes, memoranda, and correspondence (including e-mails) among Staff.
Conflict of interest:	A situation in which Staff have an actual, perceived or potential personal interest (whether financial, personal or otherwise) that may affect, or be affected by, the conduct of their duties and responsibilities with respect to IUCN, or is otherwise contrary to the interests of IUCN. A conflict of interest or appearance of conflict of interest may arise when: (a) a Staff Member’s private interests interfere or appear to interfere with the interests of IUCN; (b) a Staff Member takes action or has interests that make it difficult to discharge his/her functions impartially and effectively and to discharge his/her official duties with only IUCN’s interests in mind; or (c) a Staff Member receives improper personal benefits as a result of his/her status or affiliation with IUCN. Conflicts of interest can be of a financial nature, arise from personal relationships/ family members, take the form of intellectual bias, or generate unfair or competitive advantage.



Contact Person:	A Staff Member in charge of the relationship with a donor, a partner organization, a contractor, a subcontractor, a vendor, or a supplier.
Corruption:	The offering, giving, receiving or soliciting, directly or indirectly, or attempt to do so, of anything of value to improperly influence the actions of another party. Without limiting the foregoing, corruption could involve, among other things, an abuse of a conflict of interest, improper gratuities (including unauthorized acceptance of honours, gifts or remuneration), bribery (including kickbacks) or economic extortion.
Discrimination:	Any unjustifiable differentiation between individuals or groups or the unjust or prejudicial treatment of different categories of Staff, based on such grounds as a Staff Member’s race, gender, religion, nationality, ethnic origin, sexual orientation, disability, age, language, or any other protected characteristic under applicable law. It may constitute a series of events or a one-time incident.
Ethical Misconduct:	Conduct prohibited by IUCN professional standards as described in the Code of Conduct and Professional Ethics; the Policy on the Protection against Sexual Exploitation, Abuse, and Harassment; the Anti-Fraud and Anti-Corruption Policy, and the Whistleblowing and Anti-Retaliation Policy.
Financing of terrorism:	(and other sanctioned individuals or entities) is the provision or collection of resources, by any means, directly or indirectly, with the intention that they should be used or in the knowledge that they are to be used, in full or in part, to benefit individuals and entities subject to measures imposed by the United Nations Security Council and appearing on the United Nations Security Council Consolidated List. And also, the commission of any offense as set out in Article 2 of the International Convention for the Suppression of the Financing of Terrorism.
Fraud:	is any act or omission, including any misrepresentation, that knowingly misleads, or attempts to mislead, a party to obtain any financial or other advantage, or to avoid any obligation whether for oneself or for others. Without limiting the foregoing, fraud could involve, among other things, misappropriation of cash (for example through fraudulent claims or disbursements) or other assets (for example through unauthorised use of IUCN assets or falsifying inventory records) or fraudulent statements (for example through purposefully misreporting or omitting information).
Harassment:	Refers to any unwelcome or offensive conduct that has had, or might reasonably be expected to have, the effect of: (1) offending, humiliating, embarrassing or intimidating another person(s), and (2) creating an intimidating or hostile work environment and/or unreasonably interfering with another person(s)’ ability to carry out their functions at work.
Intellectual property:	The right to patents, copyrights, and trademarks and any other form of legally protected intellectual property with respect to goods and/or services and other materials which bear a direct relation to or are produced, prepared, or collected in consequence of or in the course of IUCN work.
Line Manager:	Direct supervisor of an IUCN Secretariat staff member.
Money laundering:	is the conversion, transfer, acquisition, possession or use of property by any person who knows or who may be reasonably presumed to know that such property is derived from any criminal activity or from an act of participation in such activity, including the concealment, or disguise of the true nature, source, location, disposition, movement, rights with respect to, or ownership

	of, such property or aiding, abetting and facilitating such acts.
Property of IUCN:	Any real, tangible or intangible property that is owned, licensed or leased by IUCN, including, without limitation, financial assets, moveable property, information, information technology and telecommunications equipment, and other resources. The term also includes, as appropriate, intellectual property as defined above.
Protected Activity:	Refers to any of the following: <ul style="list-style-type: none"> • Reporting suspicions of ethical misconduct through the established reporting mechanisms; • Assisting a Whistleblower who reports suspicions of ethical misconduct through the established reporting mechanisms; and • Cooperating with a duly authorized investigation (for example, as a witness in an investigation following a report of suspected ethical misconduct) or audit procedure.
Retaliation:	Refer to definition on page 7.
Sexual exploitation or sexual abuse:	Any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. The term “sexual abuse” refers to the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. This definition includes sexual relations with a child, defined as a “human being below the age of eighteen years” in the United Nations Convention on the Rights of the Child. Any person of any gender identity may be the victim of sexual exploitation.
Sexual harassment:	Any unwelcome and unwanted behaviour of a sexual nature, whether verbal or physical, that is offensive or creates a hostile or intimidating work environment. Sexual harassment may include unwanted sexual advances, unsolicited requests for sexual favours, or any other behaviour of a sexual nature that might reasonably be expected or perceived to intimidate, cause offense or humiliation to another, when such conduct interferes with work or is made a condition of employment. See Anti-Harassment Policy for more details.
Staff or Staff members:	Staff, or Staff members, for purposes of this Code, include IUCN Secretariat personal as well as temporary staff, staff hired on a temporary basis through recruitment companies, secondees, trainees, interns, and students.
Suspicion of ethical misconduct:	Any suspected or actual ethical misconduct – see definition of ethical misconduct above.
Whistleblower:	A person who informs IUCN of a suspicion of ethical misconduct per the channels outlined in this policy. Are considered whistleblower the following categories of internal and external stakeholders: <ul style="list-style-type: none"> • All IUCN staff, temporary staff, long-term consultants, trainees, interns, and students • Third parties, including but not limited to consultants, contractors, vendors, representatives, and external partners and their staff members • Any Council member or any member of one of IUCN’s Commissions



	<ul style="list-style-type: none">• Individuals, not employed or contracted, or not yet employed or contracted by IUCN
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9. POLICY EVALUATION AND UPDATE

The Policy will be reviewed every two years. Effectiveness will be evaluated based on feedback received and documented on the whistleblowing platform and investigation process.