



CODE OF CONDUCT

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A message from Mirjam 't Lam, Managing Director

On behalf of the Executive Committee, I am delighted to present the Code of Conduct for Oikocredit. Our Code of Conduct underlines our values and commitment in building the future of Oikocredit on the foundations of integrity and trust. In the complex and rapidly changing global ecosystem, this serves as a guideline for our colleagues in their everyday work.

As a social impact investor, Oikocredit's work is multifaceted and far-reaching. Our colleagues are our agents of change and impact while being responsible for their actions. The Code of Conduct simply reiterates and reinforces our dedication to ethical, socially driven and equitable operation.

Oikocredit creates social impact by fostering a diverse network of partners worldwide – and our biggest asset is collaboration. Oikocredit only makes progress when we all take steps forward, keeping our guiding principles at the heart of everything we do.

To keep working meaningfully with a social impact focus through a wide array of regions and contexts, partners and investors, our Code of Conduct lays the collaborative and progressive framework by which Oikocredit and its staff move towards a better tomorrow.

Thank you,

Mirjam 't Lam

1. Purpose and principles

Oikocredit is a social impact investor and worldwide cooperative with over four decades of experience in promoting sustainable development through investments. Guided by the principle of empowering low-income people to improve their livelihoods, we support partner organisations in Africa, Asia and Latin America by providing loans, equity investments and capacity building.

Respect between people implies honesty and truthfulness. Oikocredit is determined to listen with an open mind and communicate in full transparency on all parameters of its own policies, understanding that **integrity** is one of our core values and a fundamental part of our daily activities.

This Code of Conduct defines the main behavioural rules which govern all our actions, expressing what we aspire to be: one of the world's most renowned social investment agents and a leading example of business integrity.

Such a mission will be carried in accordance with the below **core principles**:

- Compliance with applicable laws, standards and regulations
- Equal opportunities through inclusion and non-discrimination
- Respect for colleagues, for Oikocredit and for our Stakeholders
- Doing the right thing and seeking advice in case of doubt
- Taking personal responsibility

This means that, whilst carrying out our mission, we must obey to the rules where we operate, adopting a cooperative, honest and transparent approach when communicating with public authorities and regulators. To act with integrity also implies safeguarding mutual respect, business ethics, socioeconomic inclusion and the environment, knowing that we are all responsible for the results of our decisions.

As we work with our Partners, Members, Investors and each other, we are committed to the **mission and values** of Oikocredit:

Oikocredit is guided by the principle of empowering people. Our experience proves that the most effective and sustainable means of assisting those in need is providing an opportunity to help themselves.

Our mission

Oikocredit challenges all to invest responsibly. It provides financial services and supports organisations to improve the quality of life of low-income people or communities in a sustainable way.

Our vision

A global, just society in which resources are shared sustainably and all people are empowered with the choices they need to create a life of dignity.

Our values

People

Oikocredit supports organisations that provide financial opportunities to disadvantaged people irrespective of their faith, culture, age or gender.

Sharing

Oikocredit provides a vehicle for meaningful sharing. An uneven distribution of resources, wealth and power can lead to conflict. When the global community is prepared to share what they have, respect each other and work together, justice and peace can prevail.

Ecumenical spirit

Around the world, people of faith are willing to share their resources. Oikocredit forms part of that worldwide coalition of solidarity.

Grassroots

Development is most effective when it stems from grassroots. In the cooperative culture of Oikocredit, people's initiatives and participation are central to all acts and policies.

Integrity

Respect between people implies honesty and truthfulness. Oikocredit is determined to listen with an open mind and communicate in full transparency on all parameters of its own policies.

Environment

A balanced ecosystem is the basis for life and as such, should be preserved. Oikocredit believes that a healthy balance in nature can only be achieved in a world where resources and power are spread evenly.

We understand that this Code cannot cover every specific situation. Rather, it should serve as a general guide to our decisions to be applied with the aid of our personal values and judgement, seeking advice as appropriate.

2. Applicability of this Code

This Code of Conduct applies to **everyone who works at Oikocredit International globally**, including its subsidiaries, branches and offices; external workers (e.g., contractors and consultants); trainees, interns and students; temporary and permanent staff members; directors (statutory and non-statutory members of the Executive Committee); members of the Supervisory Board and Member Council ("**Colleagues**").

Alongside this Code, **other policies and guidelines may apply**, depending, for example, on specific professional statutes and operational best practices. In addition, we must ensure to comply with the applicable laws, standards and regulations of the many jurisdictions in which we do business.

Each of us will receive training and be periodically requested to acknowledge that we are aware of, understand and agree to comply with this Code of Conduct and related policies. Failure to do so may be viewed as a serious violation of the terms of employment and may result in disciplinary actions.

The latest versions of Oikocredit's policies and this Code will remain available at our Policies and Procedures Library. If you have any questions, do not hesitate to talk to your manager, Human Resources or Compliance.

3. Decision-making: doing the right thing and taking responsibility

The success of our mission depends directly on the values and responsible behaviour of each Colleague and decisions taken with Oikocredit's ethical standards. This requires ensuring everyone's ethical engagement across Oikocredit and earning the trust of our Members, Partners, Investors and other Stakeholders, such as civil society, communities and public authorities in every region where we do business.

When faced with an **ethical dilemma**, ask yourself the following questions:



At Oikocredit, **all of us are full-time risk managers**. This means that we must adopt a risk-based approach and take action to prevent, detect and manage the events that may impact the achievement of our goals – including misconducts and potential violations to:

- this Code, anti-fraud or anti-money laundering regulations;
- GDPR rules;
- environmental or social standards;
- internal policies and guidelines.

In order to meet our regulatory and business requirements, we must **maintain accurate documentation and evidence** of our activities, transactions, decisions, etc., which should be available for occasional audits and inspections.

We have embedded ESG factors and social performance management into our investment processes, starting with the selection (via an ESG scorecard) and later during monitoring. We include positive impact contribution aspects in our social impact approach, with the aim to improve the welfare of lower income people and not harm the environment.

Our Stakeholders trust that each of us will carry our functions with proper **duty of care and**

diligence, protecting and upholding the long-term viability of Oikocredit's activities. It is our responsibility to be aware of the risks which may result from our decisions and to manage these risks appropriately. In the end, **we are responsible for the standards we tolerate**.

4. Care and connect: treating each other with respect and dignity

One of Oikocredit's strengths is the inherent cross-cultural nature of our business relationships and staff members. **A huge part of our success relies on the fact that we embrace diversity, inclusion and equality** – key values for ensuring equal opportunities for everyone, supporting each other's varying stories, personalities and perspectives.

Mutual respect is key to developing trust, spirit of partnership and a safe workplace environment. We cherish a diverse, inclusive work environment where all ideas, perspectives, and backgrounds are considered. None of us should face discrimination on the bases of ethnicity, colour, age, sex, disability, sexual orientation, pregnancy, gender identity or marital status. We engage dialogues throughout the cooperative with an open mind, actively seeking diversity of thought. We embrace differences and value each other's contribution and we are aware of cultural sensitivities – what is acceptable in one culture may not be in another. Feedback, criticism and challenge will always be delivered in an appropriate and respectful manner. We put the collective interest of the organisation above self-interest.

At Oikocredit **we offer equal opportunities to everyone**. We strive to be unbiased and objective and ensure that our personal feelings, prejudices and preferences are not influencing our employment-related decisions. We make sure **all employees feel welcomed and connected**. We apply a listening attitude and an open mind. We strive to have a healthy life/work balance, we care for our well-being and that of others and we are respectful of each other's time.

5. Safety of the workplace

We create a safe space and encourage people to speak up. We embrace different opinions and recognise different voices. However, **we do not tolerate any form of unlawful harassment, hostile behaviours, or bullying**. By harassment we mean any behaviour that is unwelcomed toward a person and that stems from individual characteristics. Harassing behaviours may vary, but typically all share the purpose or effect of creating an intimidating, hostile, or offensive work environment. Examples of harassing acts include unwanted sexual advances, threats of violence, and offensive comments – none of which are acceptable at Oikocredit. The same is true of

disrespectful behaviour in general, including humiliating, insulting, intimidating, or isolating others.

We encourage all to report unwelcomed behaviour. Remember, all cases will be investigated and you will never suffer retaliation for making a good-faith report. If you experience or witness unwanted or inappropriate conducts that affect your or someone else's psychological or physical dignity, you can contact our Confidentiality Officer, your manager, Human Resources or Compliance.

CASE. You overheard a colleague referring to another colleague using racist language, or witnessed one colleague making inappropriate sexually suggestive comments to another colleague. What should you do?

Everyone at Oikocredit is responsible for maintaining a respectful and collaborative workplace environment, where victims of harassment or discrimination do not feel ignored or fear retaliations. You could directly say something to your colleague. If you are not comfortable in doing so, contact the Confidentiality Officer, your manager or Human Resources for advice.

There will be **no retaliation** against anyone for making a complaint in good-faith or cooperating with investigations concerning discrimination or harassment.

6. Confidential information and data privacy

We must maintain the confidentiality of Oikocredit's and our Stakeholders' information, whether it relates to financial, personal or business matters. **If in doubt, assume that the information you received is confidential and seek advice.**

CASE. One of our Partners is having doubts on how to implement a proper governance structure. The representative of this Partner asks you if it's possible for them to get support from Oikocredit's Capacity Building team. Can you share this Partner's (potentially confidential) information with an Oikocredit colleague with expertise in the field?

In this case, you would be sharing information internally to act on the Partner's best interest and increase the chances of a successful cooperation. If you're sure it complies with applicable regulations and policies- (for example, Oikocredit's GDPR Policy, which among other things has guidelines concerning how to handle personal or sensitive data) and if your colleague has the expertise in the field that the Partner needs, it's ok to share the information with him/her.

Sharing confidential information inappropriately may result in breaches of Oikocredit's legal and contractual obligations (e.g. confidentiality agreements). Always make sure to limit the amount of information you share to its intended purpose, letting the recipient know that such information is

confidential and subject to restrictions related to its use or dissemination.

Some **best practices** include the following:

- Only collect data necessary for specific professional purposes
- Keep our Stakeholders' information confidential, unless disclosure or use of the information is clearly permitted/required by the applicable law or with the expressed consent of the interested persons/entities
- Only share Stakeholders' information with colleagues who genuinely need it in order to serve the related persons'/entities' best interests, in accordance with the applicable regulations and our internal rules
- Never disclose confidential information to your family members and close relations
- At or out of the office, keep your desk clean and lock away any documentation or devices that could carry confidential, private or sensitive data
- Beware of suspicious links, e-mails or phone calls and use strong passwords by combining capital and lower-case letters, numbers and symbols
- In case of doubt, always treat the information as strictly confidential

CASE. A colleague is handling a potential partner in which you were previously employed. He asks you if you can provide some commercial and financial information that are not publicly available, explaining that this would safeguard Oikocredit's interests by allowing us to better understand the risks involved with this potential relationship. In this situation, is it ok to share this information with your colleague?

No, it's not. You still have a legal obligation to protect your former employer's confidential information and therefore ask for their permission first. By disclosing such information without authorisation, you would be breaching this Code of Conduct and exposing both yourself and Oikocredit to legal liabilities.

We must also be aware of our obligation to comply with the **General Data Protection Regulation – GDPR**, whose one of the main purposes includes the protection of fundamental rights and freedoms related to **personal data** – that is, any information relating to a natural person that can be used to identify her/him directly or indirectly (for example: name; identification number; location data; online identifiers; physical, economic or social factors).

Unless authorised to do so, we must refrain to collect, process or use personal data. If personal data needs to be obtained and processed, it must be done in a lawful and fair manner,

and only maintained for as long as it serves its purpose (see *7 Key Principles of GDPR* below). **All personal data must be secured** to prevent unauthorised access, alteration, transmission, publication, loss or damage. Each of us must ensure that new plans to process personal data are compliant with the applicable regulation. **Errors, irregularities and breaches concerning personal data should be promptly escalated.**

All data breaches can be reported via e-mail to databreach@oikocredit.org, or via the IT Applications & Infrastructure Manager at +31 651929305 or the IT Infrastructure & Software Architect at +31 638508834. If you have any questions, do not hesitate to talk to your manager or Compliance.

7 Key Principles of GDPR

- **Lawfulness, fairness and transparency.** There must be a ground for the processing of any personal data (e.g. individual consent; contractual or legal obligations). The process of collection, usage and management of personal data must be open and clear, in accordance with the individual's expectations.
- **Purpose limitation.** Personal data must be collected under specified, explicit, legitimate and documented purposes, and not further processed in a manner that is incompatible with those purposes.
- **Data minimisation.** We must collect the least amount of personal data necessary to fulfil the related purposes, reviewing such data from time to time in order to erase or anonymise the unnecessary ones.
- **Accuracy.** We must take every reasonable step to ensure that personal data that are inaccurate (in view of the purposes for which they are processed) are promptly erased or rectified.
- **Storage limitation.** As a general rule, we cannot hold data for longer than is required and we must be able to justify the reason for storing such data.
- **Integrity and confidentiality.** Personal data must be processed in a manner that ensures its appropriate security, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

- **Accountability.** We are responsible to comply with the applicable data protection laws. Thus, we must be able to demonstrate how we comply by keeping the necessary evidence, implementing appropriate security measures and reporting eventual personal data breaches.

7. Conflicts of interest

A conflict of interest is a situation in which a Colleague has, or may be perceived to have, an interest which could influence the motivation or decision-making of that Colleague when acting in her/his official capacity within Oikocredit. Such conflicts may arise, for example, between colleagues, departments or business relationships. In other words, there is a conflict of interest when someone is positioned on **both sides of a transaction** – regardless of whether an impropriety in fact occurs.

We must take measures to safeguard that a conflict of interest does not adversely affect Oikocredit and our Stakeholders. Such measures include early identification, prevention and management controls in order to ensure prompt mitigation of the risks involved, ideally before a conflict of interest materialises, assessing each potential situation on a case-by-case basis.

Oikocredit uses several **means to manage conflicts of interest**, including:

- Policies, procedures, systems and operational controls established in our Conflict of Interest Policy
- Disclosure to inform the affected party of the conflict of interest and its likely impact on them
- Avoidance of providing the service, activity or matter giving rise to the conflict of interest, where it cannot be prevented or managed effectively using other means
- Prompt escalation to the line manager, Human Resources or Company Secretary of a potential or existing conflict of interest
- Information restriction barriers to prevent the flow of information between conflicting parties
- Requiring withdrawal of parties from involvement in any decision or discussion in which they might have a conflict of interest

CASE. Your department is desperately looking for a new software to automate its processes. So far, the most interesting solution could be provided by the company where your spouse works at. Would there be a conflict in this case?

The fact that the possible supplier is also your spouse's employer could be viewed as influencing your judgement – so yes, there is a potential conflict. In this scenario, make sure that all decision-makers are aware of the potential conflict and abstain yourself from any involvement in the contracting process.

If conflict or potential conflict arises between your personal interests and the interests of Oikocredit or its stakeholders, you must disclose such conflict and resolve it in a transparent manner. Make sure to review our Conflict of Interest Policy for further details on Oikocredit's guidelines and procedures, especially regarding situations involving **persons holding politically exposed positions, hiring of relatives, outside business activities, and conflicts between colleagues and Oikocredit's business relations.**

For example, it is important for Oikocredit to ensure that a Colleague's position at another entity does not conflict with our organisational interests. Thus, a Colleague who wishes to undertake ancillary activities or functions at another entity must first assess potential conflicts of interest with her/his manager and Human Resources.

8. Gifts, entertainment and political activity

The giving and receiving of gifts varies in different cultures. However, depending on context and persons involved, it may appear that the acceptance of a gift would create an obligation from our side. **That's why, as a rule, Oikocredit does not permit the offering or acceptance of gifts,** unless they are reasonable, proportionate and for a legitimate business purpose.

By gift, we mean anything of value that is offered or accepted by any person or entity that Oikocredit deals in the course of business, or by one of Oikocredit's staff involved in the handling of a related business. Gifts can be of monetary or non-monetary nature, including benefits or advantages such as tickets, charitable donations, artwork, jewellery, etc. It can also come in the form of entertainment, such as social events, meals or drinks, cultural or recreational activities, ticketed events, etc.

CASE. XYZ Foundation, a potential Partner, is about to have an investment approved by Oikocredit. Before the decision by the Credit Committee, you suggest to your contact at XYZ that you should meet at an expensive new restaurant you have wanted to try to review the foundation's documents one last time. Is this a problem?

Yes, as this appears to be a quid pro quo situation in which the fancy meal is exchanged for your positive influence on the investment approval process. Never accept or provide gifts/entertainment that do not strictly comply with this Code.

Corruption or the appearance of corruption is unacceptable at Oikocredit, regardless of its form and circumstances. We mitigate such risks not only through the measures we take concerning conflicts of interest, but also through our **general guidelines on gifts, entertainment and political activity**:

- Avoid giving or accepting gifts, favours and gratuities that could influence or be perceived to influence your professional judgement or the performance of your duties
- All gifts must be documented and reported to the Director of Finance & Risk
- Personal benefits (e.g. loans, services, discounts) and gifts from a value above EUR 50,00 must be refused
- Oikocredit does not make direct or indirect contributions to political parties, organisations or individuals engaged in politics
- Oikocredit should publicly disclose all its charitable contributions or sponsorships, making sure that they are not being used as indirect bribery
- Arrange your private affairs as not to engage in activities that might impair the credibility of Oikocredit by giving the impression that we are fostering individuals or entities whose behaviour is perceived as not being in accordance with Oikocredit's values
- Do not allow your political affiliations or activities to unduly influence or interfere with the political neutrality that is the hallmark of Oikocredit

To avoid the risk of an appearance of impropriety, make sure to obtain all relevant pre-approvals before offering or accepting any form of gift or engaging in political activities. You can do this by providing relevant details to your manager, Head of Department or Compliance. If in doubt regarding the value or legitimate motive of the gift, then it must be reported to Compliance for further advice.

9. Crime prevention and detection

Oikocredit has grown into a worldwide organisation comprising of over 200 staff members in multiple offices across various jurisdictions, working with more than 500 Partners and supported by about 57,800 Investors and 550 Members. We must be conscious of the impact our actions can have on society.

CASE. Oikocredit operates in various jurisdictions globally. In cases where local expertise is needed, we might need to hire agents or consultants to provide further support. Could Oikocredit be liable by the actions of such external agents or consultants – for example, bribery of public authorities?

Yes, Oikocredit can be liable for acts practiced by agents operating on our behalf. That's why it is so important to perform proper due diligence and closely monitor our agents' compliance with this Code and the applicable regulations.

Each of us is responsible to support Oikocredit in preventing criminal activities, including the below ones:

- **Fraud:** perversion, omission or false representation of facts with the intention to illegally or unethically gain a personal/business advantage, or to avoid a disadvantage – for example, cooking the books, tax fraud, credit card fraud, securities fraud, false insurance claims.
- **Corruption:** dishonest behaviour or misuse of entrusted power for private gain – for example, public servants demanding money or taking favours in exchange for services; politicians misusing public money or granting public jobs/contracts to their sponsors, friends and relatives; corporations bribing officials to get lucrative deals.
- **Bribery:** illegally giving someone – usually a person in a position of authority – money or something else of value to persuade that person to do something.
- **Tax evasion:** activity in which a person or entity deliberately avoids taxpayer obligations – that is, illegal non-payment or underpayment of actual tax liabilities.
- **Money laundering:** carrying out acts through which cash or assets derived from illegal activities are moved into the legal, financial or business systems, thus acquiring ostensibly legitimate origins. The laundering process includes the attempt to disguise the true source, ownership or destination of such funds.
- **Terrorism financing:** collecting or providing material resources, by any means, to make terrorist activities possible – which includes transferring funds of both legal and illegal origin to

finance terrorist acts.

- **Cybercrime:** malicious activities such as illegal interception of data, system interferences that compromise network integrity and copyright infringements, which can then be used to commit other crimes (for example, extortion and identity theft). Typical attacks include the use of fake emails (phishing) and malicious software, which can compromise the integrity and confidentiality of the information under our responsibility.

Make sure to adopt the best practices described in topic 6. *Confidential information and data privacy* above. Suspicious activities or incidents can be reported via several ways, including e-mail to itsupport@oikocredit.org or the Operational Incidents Reporting system – don't forget to also check topic 11. *Reporting misconducts* below for further information.

CASE. Your colleague is advising an investor from a country that became subject to economic sanctions imposed by the Netherlands. To allow the processing of this investor's transactions, your colleague suggests that he uses a branch from another country. Is this ok?

No, as such advice represents a potential breach. We must never provide information on or contribute to possible circumvention of sanctions.

We are also committed to complying with the applicable **economic sanctions and embargoes**, which therefore requires us not only to stay up to date on the markets affected by them, but also to report any attempt to circumvent the sanctions regime.

Criminal conducts and related laws can be complex and apply differently across regions. Therefore, always adopt a **precautionary mindset** by being vigilant, ensuring adequate due diligence, reviewing controls and reporting any suspicious activity to your manager, Compliance or Legal.

10. Communications

Especially when contacting Partners, potential Partners, Members and Investors, it is essential that our communications are **fair, clear and accurate**. As a preventive measure, carefully review your messages and statements to avoid misleading or ambiguous interpretation – that's the best way to protect Oikocredit and yourself.

CASE. A reporter calls you asking about Oikocredit's activities. What should you do?

You should inform the reporter that all questions from the media are handled by Oikocredit's Communications team, which can be reached via communication@oikocredit.org.

Unless you have been expressly authorised by the Communications Manager, **make sure to forward all media inquiries concerning Oikocredit's activities to the Communications team.** If by mistake you already had contact with a media representative where Oikocredit has been discussed, immediately inform the Communications Manager about it.

CASE. You have been invited to a conference to discuss topics on your field of business and maybe some cases on which you have worked. Is it appropriate to attend this conference using your professional title at Oikocredit and present cases involving our activities?

If you are making any external speeches or attending events as a representative / staff member of Oikocredit, don't forget to first get approval from your manager and from the Communications Manager.

Regarding **external events or conferences**, we highly encourage our people to represent Oikocredit's values and develop themselves professionally or academically. If you are interested in attending an event as a representative or staff member of Oikocredit, first get approval from your manager and from the Communications Manager in order to ensure that (i) the event is aligned with our mission and core values; and (ii) no confidential, personal or sensitive information is at risk to be shared.

As a rule, **relationships with supervisory or regulatory authorities are managed by Legal & Compliance teams**, which may need support from other business divisions to clarify specific issues. When interacting with authorities, beware of deadlines and always seek advice if in doubt about the completeness and accuracy of the information we need to provide. **In case you receive any communication from a public authority and is not sure who at Oikocredit is handling the matter, immediately escalate it to groupcompliance@oikocredit.org.**

Finally, keep in mind that Oikocredit's communication channels must be used in an appropriate, ethical and business-oriented manner – not for personal purposes. The content of legal documents or contracts cannot be changed or deleted without prior advice from the Legal team. Also, if a document needs to be signed by Oikocredit, contact our Business Support Team for proper guidelines on the signing process and intermediation with our authorised signatories.

11. Reporting misconducts

We are constantly developing an environment for employees to feel free to express their views and concerns or escalate potential misconducts. Each of us is encouraged to **speak up** when suspecting wrongdoing or facing situations that may raise ethical, legal or regulatory concerns. Sometimes, these situations can even involve third parties, such as suppliers and business associates.

No one has the authority to compel you to do something unethical or illegal, that represents a breach of this Code, our existing policies, environmental or social standards, or the applicable regulations. If you have any questions or concerns regarding a possible course of action, you should promptly escalate them through our **internal reporting channels**:

- **Managers & Heads of Departments**
- **Human Resources**
- **Compliance**
- **Confidentiality Officers**

As a rule, further assessments on the complaints may be performed by Compliance or Human Resources as per the below:

Responsibilities matrix: assessment of internal reports

UNIT	NATURE OF THE REPORT
Compliance	<ol style="list-style-type: none"> 1. Failure to comply with internal policies and regulations 2. Data or information breach 3. AML/CFT, fraud, corruption 4. Other
HR	<ol style="list-style-type: none"> 5. Physical or moral aggression 6. Moral or sexual harassment 7. Unethical behaviour 8. Safety of the workplace, hostile behaviour, discrimination 9. Conflict of interests

Retaliation against complainants and whistleblowers who reported an issue in good-faith is prohibited, as well as retaliation against those who assist or cooperate in subsequent investigations. Anyone who engages in adverse action taken against an individual for reporting or cooperating with the investigation of such concerns may be subject to disciplinary action, including termination of employment.

Safeguarding the confidentiality of the reporting person during the whole process and respective investigations is an important measure to prevent retaliation. Therefore, **Oikocredit should only disclose the identity of the whistleblower if that is a necessary and proportionate legal obligation** – for example, in the context of further investigations by authorities or judicial proceedings.

Under the principles of fairness and presumption of innocence, the identity of the accused person(s) should also be protected during the entire process. Therefore, the responsible officers may refrain from deepening the investigation or taking additional measures if a complaint contains unsubstantiated allegations or if it is not possible to gather further information to sustain the reported issue.