

## Policies and Procedures

Policy Title	Whistleblowing Policy	Policy Number	128
Section	Governance, Organization, General Information	Approval Date	29 May 2025
Subsection	General Policies	Authorizing Entity	Board of Directors
Responsible Office	Human Resources	Effective Date	1 June 2025
Distributed To	All Employees & Contractors	Next Review Date	2 years after the approval date

### 1.0 PURPOSE

- The purpose of this Whistleblowing Policy is to provide a clear and confidential process for employees, contractors, and other stakeholders to report any suspected or actual wrongdoing within the American University of Bahrain (or the “organization”). This policy aims to ensure that all reports are:
  - Taken seriously,
  - Investigated promptly, and
  - Handled appropriately,
 while providing a safe and transparent environment to whistleblowers.

### 2.0 DEFINITIONS

**2.1 Incident:** An event or occurrence that disrupts operations, causes harm, or poses a potential threat to people, property, the environment, or an organization's integrity.

**2.2 Whistleblower:** Any individual (employee, contractor, or other stakeholder) who reports information regarding suspected or actual illegal, unethical, or improper conduct within an organization.

**2.3 Good faith:** The honest belief that the information being reported is true or reasonably suspected to be true, even if later found to be incorrect.

**2.4 Malicious reporting:** The deliberate act of making false accusations or fabricating information with the intent to harm another person or disrupt the organization.

**2.5 Anonymous reporting:** A report submitted without disclosing the identity of the whistleblower.

**2.6 Disciplinary action:** Corrective measures taken by the organization in response to violations of policies, rules, or misconduct (as per Bahrain Private Sector Labor Law No. 36 of 2012, part Ten, Article 75).

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### 3.0 ROLES AND RESPONSIBILITIES

#### 3.1 Nomination, Remuneration, and Governance Committee (NRGC):

- Primary owner of this policy,
- Oversees the implementation and effectiveness of the whistleblowing framework within the organization.
- Ensures appropriate governance structures are in place to protect whistleblowers and prevent retaliation.
- Receives, reviews, and investigates whistleblowing reports if ARC is implicated.

#### 3.2 Audit and Risk Committee (ARC):

- Shares ownership of this policy due to its role in risk management, compliance oversight, and handling whistleblowing reports.
- Receives, reviews, and investigates whistleblowing reports.
- Ensures confidential, fair, and compliant handling of reports.
- Provides recommendations to the Board of Directors on necessary actions to address whistleblower concerns.
- Reports significant whistleblowing cases and their resolutions to the Board of Directors.

#### 3.3 Human Resources (HR):

- Facilitates policy awareness.
- Ensures whistleblowers protection.
- Assists in investigations while maintaining confidentiality and impartiality.

#### 3.4 Employees and Contractors:

- Responsible for reporting any suspected or actual wrongdoing in good faith.
- Must cooperate with investigations.
- Ensure honest and not malicious reporting.
- Must not retaliate against whistleblowers.

### 4.0 POLICY

#### 4.1 Scope of Reportable Conduct

This policy applies to any suspected or actual misconduct, including but not limited to:

- Fraud or financial misconduct
- Corruption, bribery, or blackmail
- Harassment or discrimination
- Health and safety violations

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- Environmental damage
- Breach of legal or regulatory obligations
- Misuse of confidential information or deliberate concealment of wrongdoing
- Any other unethical behavior

### 4.2 Protection Against Retaliation

The organization is committed to protecting whistleblowers from any form of retaliation against whistleblowers, including but not limited to:

- Dismissal or demotion
- Harassment or discrimination
- Negative performance evaluations
- Any other adverse action related to employment or contract status

Retaliation against a whistleblower is a serious violation of this policy and will be subject to disciplinary action, including termination.

### 4.3 Confidentiality

- All reports and investigations will be treated fairly, properly, and with the utmost confidentiality.
- Information will only be shared on a need-to-know basis to ensure a thorough investigation and appropriate action.
- Unauthorized disclosure of a whistleblower's identity will be subject to disciplinary action.

### 4.4 False or Malicious Reports

- Intentionally making false or malicious reports is a serious violation of this policy and will result in disciplinary action.
- Reports made in good faith, even if they are later found to be incorrect, will be protected.

### 4.5 Awareness and Training

HR will provide regular updates to ensure employees remain aware of the Whistleblowing Policy and reporting mechanisms.

## 5.0 PROCEDURES

### 5.1 Reporting Channels

#### a. Internal Reporting

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Whistleblowers can report concerns through:

### 1. Identified Reporting

- Reports should be submitted to the ARC via the designated whistleblowing email: [whistleblowing@aubh.edu.bh](mailto:whistleblowing@aubh.edu.bh).
- The organization ensures confidentiality and protection from retaliation.

### 2. Anonymous Reporting

- Whistleblowers who wish to remain anonymous may submit their report using a temporary or generic email account that does not contain identifying information (e.g., Temp Mail, Guerrilla Mail, etc.) via the designated whistleblowing email: [whistleblowing@aubh.edu.bh](mailto:whistleblowing@aubh.edu.bh).
- While anonymity is protected, whistleblowers should be aware that it may limit the ability to seek clarifications or conduct a comprehensive investigation.

### b. External Reporting

1. If internal reporting channels are insufficient, compromised, or inappropriate for the nature of the concern, whistleblowers may report directly to:
  - Regulatory authorities or
  - Law enforcement agencies.
2. If an external report is made and the organization becomes aware of it, the case will be reported to the ARC for internal follow-up.

## 5.2 Report Content and Required Information

To facilitate a thorough and fair investigation, whistleblowers should provide the following details when submitting a report:

- a. Incident Description – Clear and factual details, including involved parties.
- b. Date and Time of Incident – Specific or estimated date(s) and time(s) of occurrence.
- c. Supporting Documents – Any available evidence (e.g., emails, documents, recordings, or witness details).
- d. Type of Violation – Classification of the issue (e.g., fraud, harassment, regulatory breach).
- e. Impact of the Incident – How it affects the organization, employees, or stakeholders.
- f. Disclosure of Conflict of Interest – Any personal or professional relationship with involved parties.
- g. Previous Reporting (if applicable) – Details of prior reports and responses received.

## 5.3 Investigation Process

### 1. Initial Review

- The ARC will conduct a preliminary assessment of the report.
- If the case is valid, an investigation will be initiated.

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### 2. Investigation Assignment

- Investigations are handled by a designated internal committee or external investigators, depending on the case.
- HR may assist but will maintain neutrality.

### 3. Escalation & Alternative Mechanism

- If a report involves ARC members, the case will be escalated to the NRG to ensure impartiality.
- If the NRG is also implicated, the case will be directed to the Board of Directors.
- In extreme cases, an independent external investigator may be appointed.

### 4. Resolution & Action

- Investigation findings will be reviewed by the ARC (or NRG if ARC is implicated).
- Significant cases may be escalated to the Board of Directors.
- Appropriate corrective or disciplinary actions will be taken.

### 5.4 Protection and Support

- Whistleblowers are protected throughout the investigation.
- Retaliation against a whistleblower is subject to severe disciplinary action.

## 6.0 RELATED DOCUMENTS AND REFERENCES

### 6.1 Human Resources Policy

### 6.2 AUBH Employee Grievance and Complaint Policy

## POLICY HISTORY

Date of Last Action	Action Taken/Changes	Authorizing Entity	Effective Date
29 May 2025	The document was approved by the BoD	BoD	1 June 2025