



**MFC NYETAA**

MALI-FOLKECENTER

BONNE GOUVERNANCE - DÉVELOPPEMENT ÉCONOMIQUE LOCAL - ENVIRONNEMENT

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# Whistleblower and Witness Protection Policy (WWPP)

**Mali-Folkecenter Nyetaa (MFC Nyetaa)**

**Approved by the Board of Directions: March, 11<sup>th</sup> 2025**

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Inspiration – Innovation – Sustainability

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**List of abbreviations and acronyms**

- AfDB :** African Development Bank
- BoD :** Board of Directors
- ED :** Executive Director
- EIO :** Ethics and Integrity Office
- GCF :** Green Climate Fund
- IFC :** International Finance Corporation
- ISO :** International Organization for Standardization
- MFC Nyetaa :** Mali-Folkecenter Nyetaa
- UNDP :** United Nations Development Programme
- WWPP :** Whistleblower and Witness Protection Policy

## I. Purpose and Commitment

Mali-Folkecenter Nyetaa (MFC Nyetaa) is committed to integrity, fairness, and transparency in all its actions.

This policy protects our organization, partners, and communities from any form of fraud, corruption, misconduct, or abuse, and ensures that anyone concerned can speak up safely. It reflects international best practices established by the GCF, AfDB, IFC, and UNDP, and embodies MFC Nyetaa's accountability values toward the people we serve.

## II. Scope

This policy applies to:

- All MFC Nyetaa employees, board members, consultants, interns, and volunteers;
- All implementing partners, suppliers, contractors, and service providers;
- All beneficiaries and community members directly or indirectly affected by our activities.

It covers all acts of fraud, corruption, abuse, discrimination, environmental or social harm, as well as any breach of MFC Nyetaa's Code of Conduct.

## III. Definitions

- **Fraud:** Any intentional deception aimed at obtaining an unfair or illegal advantage.
- **Corruption:** Abuse of entrusted power for personal or institutional gain, including bribery, favoritism, or embezzlement.
- **Misconduct:** Violation of professional ethics or institutional values.
- **Grievance:** Any complaint related to unfair treatment, harassment, exclusion, or harm caused by MFC Nyetaa's actions or personnel.
- **Whistleblower:** Any person who reports a concern in good faith.

## IV. Core Principles

- **Zero Tolerance:** No form of fraud, corruption, or harassment will be tolerated.
- **Independence:** Investigations are conducted by an Ethics and Integrity Office (EIO) functionally independent from management and reporting directly to the Chair of the Board.
- **Confidentiality:** Identities are protected and information is shared only on a need-to-know basis.
- **Non-Retaliation:** Whistleblowers shall never face retaliation for good-faith reporting.
- **Accessibility:** Reporting channels are simple, inclusive, and adapted for illiterate persons.
- **Transparency:** Findings and lessons learned are recorded and used for continuous improvement.

## V. Governance and Responsibilities

At MFC Nyetaa, the Ethics and Integrity Office (EIO) operates within the Internal Audit Unit.

The designated Ethics Officer acts independently of management on all integrity and grievance matters.

The EIO reports directly to the Chair of the Board of Directors on all complaints, investigations, and integrity reports.

### Roles:

- **Board of Directors:** Approves and monitors this policy; ensures EIO independence and resources.
- **Chair of the Board:** Provides direct oversight of the EIO; receives sensitive reports; ensures corrective actions.
- **Ethics and Integrity Office (EIO):** Independent focal point for receiving, documenting, and investigating complaints; prepares quarterly integrity reports for the Board.
- **Executive Director and Management:** Ensure staff awareness, prevention systems, and enforcement of corrective measures.
- **Internal Auditor:** Verifies financial integrity and controls; supports investigations and coordinates with the EIO when needed.
- **All employees and partners:** Have a duty to report suspicions and comply with this policy.

## VI. Prevention and Awareness

- Annual training on integrity and ethics for staff and partners.
- Anti-fraud clauses included in all contracts.
- Annual signing of Code of Conduct and conflict of interest declarations.
- Transparent procurement and recruitment systems.
- Internal audits and external reviews conducted at least once per year.
- Community awareness on grievance mechanisms (via radio, posters, meetings).

## VII. Reporting Channels

Anyone may report fraud, corruption, misconduct, or grievances through one of the following secure and accessible channels:

- **WhatsApp & Voice Hotline:** +223 67 89 99 17  
(voice or message in Bambara, Fulani, French, or English – accessible to illiterate persons)
- **Email:** [signalement@malifolkecenter.org](mailto:signalement@malifolkecenter.org)  
(confidential access managed only by the Ethics and Integrity Office)
- **Secure Suggestion and Complaint Boxes:**  
Lockable boxes are installed in all MFC offices and project sites, in visible but

discreet locations accessible to staff, partners, and community members. The boxes are clearly labeled in French and Bambara and include a simple visual guide for illiterate users. They are opened only by the designated Ethics and Integrity Officer (EIO) or a formally appointed member of the integrity committee – never by operational staff. Keys are held exclusively by the EIO. Boxes are checked at least every two weeks, and all forms received are recorded confidentially with date and reference code.

- **In person:** Through trained community focal points who record oral complaints securely.
- **By mail:** Addressed to the Head of the Ethics and Integrity Office, c/o Secretariat of the MFC Nyetaa Board of Directors, Bamako. Anonymous submissions are accepted and treated with the same seriousness and confidentiality as signed reports.

## VIII. Complaint Handling Procedure

### Step 1: Receipt and Acknowledgment

All complaints are logged by the EIO within 48 hours and assigned a reference number.

### Step 2: Preliminary Assessment

The EIO reviews admissibility and prepares a short note to the Board Chair describing the case's nature and sensitivity.

### Step 3: Investigation

An independent investigation committee (EIO + Internal Auditor + external expert if necessary) conducts an objective and confidential investigation within 30 days.

### Step 4: Decision and Corrective Actions

The conclusions and recommendations are presented to the Chairman of the Board of Directors and members, who approve corrective measures: disciplinary action, recovery, legal proceedings or system improvements.

### Step 5: Feedback and Closure

Where applicable, the complainant receives feedback, and the case is closed and recorded in the integrity register.

## IX. Whistleblower Protection

MFC Nyetaa guarantees protection against retaliation, dismissal, or harassment to anyone reporting a concern in good faith.

Any retaliatory act will be treated as a disciplinary offense.

Whistleblowers may remain anonymous while still benefiting from protection.

## X. Community Access and Adaptation

Illiterate beneficiaries may record voice messages via WhatsApp or report orally through trusted focal points.

Secure suggestion and complaint boxes are available in each MFC office and project sites.

Each box is lockable, clearly labeled, and placed in an accessible yet private location.

Boxes are under the exclusive control of the Ethics and Integrity Officer.

Keys are not held by any operational or field staff.

The Ethics Officer empties the boxes every two weeks, logs submissions, and initiates investigations if required.

Communities are regularly informed that complaints can be anonymous and that no retaliation or discrimination will follow any report.

Posters using symbols (ear = listening, padlock = confidentiality, tree = justice) are displayed in all project areas to promote awareness.

Community radio programs and awareness sessions remind beneficiaries of their right to use these mechanisms.

## XI. Sanctions and Disciplinary Measures

- Verbal or written warning.
- Suspension or termination of employment.
- Termination of contract or partnership.
- Reimbursement of funds.
- Referral to national judicial authorities or donor integrity units (e.g., GCF, AfDB, IFC Integrity).

## XII. Monitoring and Reporting

The Ethics and Integrity Office issues quarterly summaries (without personal data) to the Chair of the Board of Directors.

An annual integrity report compiles trends, lessons learned, and policy updates.

**Key indicators:** number of cases, resolution time, type of violation, corrective actions, and training coverage.

## XIII. References

- **GCF (Green Climate Fund):** Policy on Prohibited Practices.
- **IFC (International Finance Corporation/World Bank):** Good Practice Note on Grievance Mechanisms.
- **AfDB (African Development Bank):** Integrity and Anti-Corruption Policy (2006) and Independent Review Mechanism (2021).
- **UNDP:** Anti-Fraud Policy and Whistleblower Protection Policy – ISO 37001:2016.
- **Mali Anti-Corruption Law:** Law No. 2014-015 on the Prevention and Repression of Corruption and Illicit Enrichment.

#### **XIV. Entry into Force and Revision**

This policy takes effect upon approval by the Board of Directors.

It will be reviewed every two years, or earlier if necessary, based on updates to GCF, AfDB, or IFC standards.

**Approved by:**

The Board of Directors of Mali-Folkecenter Nyetaa

**Effective Date:** March, 11<sup>th</sup> 2025

