



English Institute Whistleblowing Policy

1. Purpose

The purpose of this Whistleblowing Policy is to encourage and enable employees to raise serious concerns within the organization prior to seeking resolution outside the organization. This policy aims to provide a transparent and confidential process for addressing concerns.

2. Scope

This policy applies to all employees, contractors, consultants, and any individuals associated with English Institute Sprachreisen GmbH.

3. Policy Statement

English Institute Sprachreisen GmbH is committed to maintaining a workplace characterized by integrity, accountability, and ethical conduct. It is the policy of English Institute Sprachreisen GmbH to investigate all whistleblowing reports promptly, thoroughly, and with the highest level of confidentiality possible.

4. Definitions

- **Whistleblower:** An individual who reports unethical, illegal, or unsafe practices.
- **Whistleblowing:** The act of reporting unethical, illegal, or unsafe practices within the organization.

5. Protected Disclosures

The following are examples of concerns that may be reported under this policy:

- Financial misconduct or fraud
- Violation of company policies or procedures
- Unethical behavior or actions
- Harassment, discrimination, or workplace bullying
- Health and safety violations
- Environmental damage
- Any other illegal activities

6. Reporting Procedures

- **Initial Reporting:** Concerns should be reported to the employee's immediate supervisor. If the whistleblower is not comfortable reporting to their supervisor, they may report to the Human Resources department or use the anonymous whistleblowing hotline/email.

ENGLISH INSTITUTE Sprachreisen GmbH

Haunspergstraße 37a, A5020 Salzburg



www.facebook.com/englishinstitute/

www.instagram.com/english_institute_sprachreisen

established in 1980

+ 43 662 90 80 90

www.english-institute.at

office@english-institute.at

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- **Anonymous Reporting:** English Institute Sprachreisen GmbH provides an anonymous reporting mechanism to ensure the whistleblower's identity is protected.
 - **Salzburg Arbeitskammer:** +43 662 8687
- **Formal Reporting:** A formal written report may be submitted to https://sbg.arbeiterkammer.at/ueberuns/kontakt/Anfrageformular_Allgemein.html. The report should include detailed information about the concern, any evidence available, and the names of any individuals involved.

7. Investigation

- **Acknowledgement:** Upon receipt of a whistleblowing report, an acknowledgement will be sent to the whistleblower within a few working days, if their identity is known.
- **Assessment:** The report will be assessed to determine the appropriate course of action. This may involve a preliminary investigation.
- **Full Investigation:** If a full investigation is warranted, it will be conducted by the Salzburg Arbeitskammer with the necessary expertise and independence.
- **Outcome:** The whistleblower will be informed of the outcome of the investigation, subject to legal and confidentiality constraints.

8. Protection of Whistleblowers

- **Confidentiality:** The identity of the whistleblower will be kept confidential to the extent possible, consistent with the need to conduct a thorough investigation.
- **Retaliation:** English Institute Sprachreisen GmbH prohibits retaliation against whistleblowers. Any form of retaliation will be treated as a serious disciplinary offense.
- **Support:** Whistleblowers will have access to support and counseling services if needed.

9. False Allegations

Employees who knowingly make false or malicious allegations may be subject to disciplinary action.

10. Responsibilities

- **Employees:** Responsible for reporting concerns in good faith and cooperating with investigations.
- **Supervisors and Managers:** Responsible for addressing concerns raised by employees and reporting them to the appropriate department.
- **Whistleblowing Officer/Department:** Responsible for receiving reports, conducting investigations, and maintaining records of all whistleblowing activities.

11. Communication and Training

This policy will be communicated to all employees and included in the employee handbook. Training on whistleblowing procedures will be provided regularly.

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12. Review of Policy

This policy will be reviewed annually and updated as necessary to ensure its effectiveness.

Approved by: Gabrielle H. Kalke Hinterbuchner, CEO English Institute Sprachreisen GmbH

Effective Date: June 1, 2023

Updated Date: June 1, 2024

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