



## Whistleblowing Channel Guide

March 23<sup>rd</sup>, 2023

### 1. What is the whistleblowing channel?

The whistleblowing channel (ilmoituskanava) allows you to confidentially report suspected activities you have found out in your work and which are in violation of the law according to the Notifies Protection Act and that may harm individuals, the organisation or the environment. A report may concern the disclosure of suspected irregularities or risks related to the operation of the Opera and Ballet.

Such irregularities may relate to issues such as corruption, bribery, fraud, embezzlement or other criminal activity, security risks, environmental damage, public procurement, public operational grants, protection of privacy and personal data, and consumer protection.

On 15 February 2023, the Board of Directors decided on the whistleblowing channel, the procedure for handling reports, the case handlers and decision-makers, and issued procedural instructions.

### 2. Who can report through the channel?

The whistleblowing channel can be used by Opera and Ballet employees, guest artists, leased workers, self-employed professionals, trainees and employees of stakeholders (e.g. subcontractors and partners), directors, members of the Board and the Advisory Board, and vocational training students of the Ballet School.

It is everyone's responsibility to report any irregularities detected in line with this guide.

The reports are internal and not intended to be made public.

### 3. What issues are reported through the whistleblowing channel?

The principle of the whistleblowing channel is that the whistleblower can bring concerns about violations of certain norms in the organisation to the attention of the organisation without fear of retaliation. The whistleblower does not need to have solid evidence before reporting suspected wrongdoing, but reports must be made in good faith.

Examples of suspected wrongdoing to be reported through the whistleblowing channel:

- corruption and bribery,
- misuse of funds and resources,
- misrepresentation of financial information and falsification of reports,
- misuse of business secrets,
- conflicts of interest in the use of suppliers and subcontractors,

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- non-compliance with environmental regulations, for example in the treatment of hazardous waste,
- unauthorised viewing of personal data without a work-related reason.

Although reports can still be made by other written or oral means, such as e-mail, letter, telephone or in person, the use of the electronic whistleblowing channel is primary and preferred.

The following should not be reported through the whistleblowing channel:

- safety flaws or observations (use the Falcony channel or submit your report to the occupational safety and security manager or your supervisor),
- inappropriate behaviour or harassment (primarily contact your immediate supervisor or other person mentioned in the Proper Conduct Allowed Guide),
- discrimination (contact your immediate supervisor or his or her supervisor, or the HR team),
- matters concerning an individual employee's contract, such as questions about pay (contact your immediate supervisor or the HR team),
- feedback and complaints.

#### **4. Where to find the whistleblowing channel?**

A link to the whistleblowing channel can be found on Intro, visitor information pages and Opera and Ballet website.

#### **5. How to submit a report?**

A report is made through the whistleblowing channel. Instructions for submitting a report can be found in the Intro section dealing with the whistleblowing channel. The whistleblower will receive confirmation of a submitted report within seven (7) days. The whistleblower will then be notified of the action taken on the report within three (3) months. All communication through the whistleblowing channel is done with a login ID and case number. No separate email will be sent to the whistleblower on messages or reports sent through the channel.

#### **6. Processing and investigating reports**

Information obtained through the notification channel will be treated confidentially in accordance with applicable notifier protection, data protection and other legislation. The identity of the whistleblower is kept secret. The processing of personal data is based on a legal obligation and personal data may also be collected from other than the data subject himself.

In addition to your personal data, the employee's notification may contain information about third parties referred to in the notification. Processing is confidential and the notified person does not receive information about the identity of the whistleblower. The identity of the whistleblower will be kept secret during processing.



The notification channel contains a privacy policy with additional information on the processing, purpose and legal basis of the notifier's personal data.

Reported cases are investigated in a confidential, timely, consistent and impartial manner. The Opera and Ballet's case handlers are Anita Prusila, General Counsel, Ulla Paavola, Financial Manager and Hanna Fontana, HR Manager, with Lotta Niemelä, Employment Lawyer acting as deputy case handler. A member of the Board appointed Audit Committee and/or the Director General of the Opera and Ballet and the Chairman of the Board may participate in the resolution of such reports.

The reports are presented annually to the Audit Committee of the Opera and Ballet.

## **7. Protection of whistleblowers**

The Opera and Ballet encourages transparency and protects and supports whistleblowers who, under this guide and in good faith, raise genuine concerns, even if they later prove to be incorrect or unfounded. If a report is made in good faith, the Opera and the Ballet will not allow the whistleblower to be treated unfavourably (protection against retaliation). In order to be protected against retaliation, the report must be made in one's own name.

However, if it is apparent that the whistleblower has made false allegations with malicious intent or otherwise not in good faith, the whistleblower is not entitled to protection. A report made under false pretences or with malicious intent may lead to sanctions.

This employer's guide on the whistleblowing channel is valid from 1<sup>st</sup> April 2023, and the employer may subsequently make changes to the guide if necessary.

The draft of this Whistleblower Channel Guide has been considered by the Codetermination Committee on 18.5.2021.

For more information, please contact Anita Prusila, Ulla Paavola or Hanna Fontana.

March 23<sup>rd</sup>, 2023

Gita Kadambi

General Director