



بنك تنمية المدن والقرى
CITIES & VILLAGES DEVELOPMENT BANK

Policy on Reporting Illegitimate Practices and Whistleblower Protection 2026

Contents

1	Purpose
2	Scope
3	Violations
4	Guarantees and Whistleblower Protection
5	Reporting Procedures and Handling Violations

Policy on Reporting Illegitimate Practices and Protecting Whistleblowers at the Cities and Villages Development Bank of 2020, issued in accordance with Articles 23 and 30 of the Anti-Corruption and Integrity Commission Law No. 62 of 2006.

The following words and phrases, wherever they appear in this Policy, shall have the meanings designated for them below unless the context indicates otherwise:

- Bank: Cities and Villages Development Bank
- Board: Bank's Board of Directors
- Manager: Bank's Board of Directors
- Committee: Committee for handling reports
- Whistleblower: Individual reporting the violation
- Protection seeker: The whistleblower, informant or witness submitting a protection request.
- Commission: Integrity and Anti-Corruption Commission
- Malicious report: Reporting violations without evidence with the intent to cause harm.
- Stakeholders: Parties with an interest in the Bank which may influence or be influenced by the Bank and its policies.
- Prohibited Practices: The Prohibited Practices of the Green Climate Fund (GCF), as detailed in CVDB's [Anti-Corruption and Fraud Prevention Policy](#)

Purpose of the Policy

The policy for reporting illegitimate practices and whistleblower protection aims to enhance the Bank's procedures to comply with good governance principles and attain the highest levels of transparency, discipline, accountability and compliance with all legislation regulating operation. This will encourage staff and parties interacting with the Bank to report violations and illegitimate practices which impact the Bank's work, interests, reputation and assets and reassures them that these dealings are safe and acceptable, and do not entail any responsibility.

Scope

This policy applies to everyone working for the Bank, whether they are Board members or staff, regardless of their positions in the Bank, without exception. Stakeholders and others may also report any risks, violations or illegitimate practices, including Prohibited Practices as defined and established by the GCF for GCF-funded projects.

Violations

Any illegitimate practice that violates the provisions in the Employee Code of Conduct and Public Office Ethics in accordance with the provisions of Article 68 of the Civil Service Bylaws No. 9 of 2020 shall be deemed a violation for which its perpetrator shall be penalized.

Guarantees and Whistleblower Protection

❖ First: Cities and Villages Development Bank:

To protect the personal interests of the whistleblower, the Bank shall ensure every effort possible and appropriate is made to maintain the confidentiality and anonymity of the whistleblower.

❖ Second: Integrity and Anti-Corruption Commission:

The Bylaws on the Protection of Whistleblowers, Witnesses, Informants and Experts in Case of Corruption and their Relatives and Individuals Closely Connected with Them, issued in accordance with paragraph C of Article 23 and Article 30 of the Anti-Corruption Commission Law No. 62 of 2006.

❖ **Third (Reporting Procedures and Handling Violations)**

1. The Manager shall form a committee of specialists at the Bank to receive and handle reports. The committee is responsible for creating standards, instructions and mechanisms of operation for its work, to be submitted to the Board. The rapporteur and member must sign the acknowledgement and commitment form relevant to maintain the confidentiality and anonymity of everything relevant to the information on the nature of the committee's work, and to refrain from disclosing it.
2. The whistleblower shall submit this report supporting by the documents available through the means deemed appropriate by the Bank, including electronic means, provided that the information included in the attached form is included, to the committee rapporteur.
3. The committee rapporteur shall codify the report and convene a committee meeting. The committee shall take the action it deems appropriate in accordance with the regulating legislation to handle the violation.
4. If the report warrants an investigation, an investigation committee shall be formed of specialists to investigate the report with complete confidentiality without revealing the identity of the whistleblower under any circumstances.
5. If it is conclusively proven that the report was malicious and intentionally, disciplinary and legal action shall be taken against the whistleblower, in accordance with the violation.
6. If proven, the violation shall be referred to the Integrity and Anti-Corruption Commission with a request for whistleblower protection based on the recommendation of the formed investigation committee.
7. The committee rapporteur shall inform the informant of the measure to be taken with regard to the report submitted by him within an agreed upon framework.
8. The committee rapporteur shall maintain the reports, investigation reports and supporting documents in a special and confidential file, which shall be codified.
9. The Board is responsible for reviewing and amending this policy and may seek the opinions of specialists to this end.

For reporting suspected engagements in Prohibited Practices, please refer to CVDB's [Anti-Corruption and Fraud Prevention Policy](#). The link provided in this policy connects directly to a portal where interested parties can submit anonymous reports, suggestions, complaints, and grievances. Anonymous reports will be treated with the utmost confidentiality in line with the provisions of this Whistleblower Policy, and reportees will have the protections afforded to them under the 30 of the Anti-Corruption and Integrity Commission Law No. 62 of 2006.

Green Climate Fund (GCF)

For any GCF funded activities, the Bank will make available GCF's Policy on the Protection of Whistleblowers and Witnesses, included as Annex 1 to this policy.

This policy was drafted by the advisory team and the Global Green Growth Institute under the umbrella of the accreditation project for the Cities and Development Bank as a Green Climate Fund in Jordan.

Annex 1: Whistleblower Protection for Green Climate Fund (GCF) funded activities

For any project or programme with funding from the GCF, CVDB will make available GCF's Policy on the Protection of Whistleblowers and Witnesses. Specifically, any person or entity involved or affected by a project, programme, or funding activity will have access to GCF's reporting and investigation function (outlined below). This annex will be updated periodically to ensure the most up-to-date information from the GCF is included.

Reporting and Investigation of Suspected Wrongdoing

1. Any person or entity may report to the Green Climate Fund's (GCF) Independent Integrity Unit (IIU) allegations of suspected Wrongdoing as defined by this Policy. Persons with information concerning suspected Wrongdoing, particularly when it involves Covered Individuals and Counterparties in Fund-related Activities, are strongly encouraged to report such information to the IIU.
2. Subject to protections available, Covered Individuals have a duty to report suspected Wrongdoing as soon as possible after becoming aware of the suspected Wrongdoing in relation to any Fund-related Activity. No approval, authorizations or clearance shall be necessary for GCF Personnel to report suspected Wrongdoing.
3. Subject to protections available, any supervisor, manager or other such person of the GCF who receives a report of suspected Wrongdoing which is made in good faith, is obligated to transmit such report without delay to the IIU.
4. In accordance with the Interim Policy on Prohibited Practices of the GCF and any succeeding Policy pertaining thereto, Counterparties are obligated to promptly inform the Fund of reports of suspected Prohibited Practices found or alleged in connection with a Fund-related Activity; to investigate reports of suspected Prohibited Practices; and to report preliminary and final findings of such investigations to the Fund. This obligation is subject to the terms and conditions of any prevailing legal agreements with the GCF.
5. Reports and information referred to above, shall be sent to the IIU through any of the following points of contact on the proviso that any changes regarding the contact details shall be communicated and disseminated appropriately:

Email: integrity@gcfund.org

Hotline: +82 32 458 6155

Facsimile: +82 32 458 6095

Mailing Address:

Independent Integrity Unit
Green Climate Fund

6. Where a report of suspected Wrongdoing is made against GCF Personnel, a Board-appointed Official (excluding the Executive Director and the Head of IIU), or an External Member of GCF Panels or Groups, or their immediate family members, such report shall be made to the Head of IIU. Reports of suspected Wrongdoing made against a GCF Personnel working under the authority of the Head of the IIU may be made to the Head of the IIU, or to the Chair of the EAC on an interim basis until other mechanisms are established.