

- Publisher: NIK Denameda d.o.o. ● Redakcija: La Benevolencija 6, 71000 Sarajevo
- Tel/Fax: +387 33 260 210 ; 204 060 ● Marketing: +387 33 204 060 +387 62 340 017
- Email: start.reklame@gmail.com,

## Diversity Policy

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### Guidelines

## Introduction

Start BiH Magazine and the website [www.startbih.ba](http://www.startbih.ba) are recognized by the public of Bosnia and Herzegovina as responsible and professional media. We are firmly committed to maintaining and promoting the highest standards of journalism in Bosnia and Herzegovina.

Our employees, external associates, freelancers and all those who participate in creating media content on the principles of ethics, honesty, openness and responsibility play an important role in all this.

Although our company is small and it is an easy way to solve possible problems at work, it is our desire to determine this way of solving by the guidelines of this Document.

All of us at some point may have concerns about what is happening at work. Usually these concerns are easily addressed. However, when it comes to violations of the law, serious misconduct by another person, health and safety regulations, or financial abuse, it can be difficult to know what to do. In Start, such topics are very rare. However, if you have a reasonable care, this policy allows you to respond in an appropriate and effective manner.

If you notice and are concerned about these issues that you think should be reported and investigated, please follow this policy. Always try to resolve any concerns with your line manager and follow the other available routes if that is not possible. All things will be considered.

This Document is designed to protect those who raise genuine concerns about potential misconduct.

There is no law in BiH regulating the protection of whistleblowers, only the Law on the Protection of Persons Reporting Corruption in the Institutions of Bosnia and Herzegovina. However, it stipulates that only employees of state institutions can receive the status of whistleblower, while other citizens are left out. This status is conferred by the Anti-Corruption Prevention and Coordination Agency (APIK).

In addition to this situation with the legislation in our country, in creating our Whistleblower policy document, we were guided by the mentioned Law.

## Policy Statement

Start BiH fosters an open culture in all the work between staff, managers and all the people with whom it comes in contact. Effective and honest communication is crucial to effectively addressing any potential abuse.

The procedure below provides guidance for all Start staff, individuals working at the Start, including casual temporary agency employees, freelancers, contracting authorities who feel they need to raise specific issues related to START BiH.

There is no journalist union in Bosnia and Herzegovina but there is a Journalists Support Line within the BH Journalists Association. December 16, 2013, Law on Protection of Persons Reporting Corruption in the Institutions of Bosnia and Herzegovina was adopted - this law does not exist for private companies, but nevertheless, it lays the foundations for promoting responsibility and protection in our company in the following case:

- that a criminal offence has been committed, is being committed or is likely to be committed;

- that a person has failed, is failing or is likely to fail to comply with a legal obligations which they are subject to;
- that a miscarriage of justice has occurred, is occurring or is likely to occur;
- that the health and safety of an individual has been, is being or is likely to be endangered;
- that the environment has been, is being or is likely to be damaged;
- that information tending to show any matter falling within the matters above has been, is being or is likely to be concealed.

As our company is small, this procedure can also be applied in cases of complaints of abuse and harassment.

The process is not a channel for staff to raise questions about their terms and conditions of employment in general.

The procedure allows individuals to have their concerns treated in confidence.

All concerns must be raised in good faith. Anyone who abuses the procedure (for example by maliciously raising a concern they know to be untrue) will be subject to disciplinary action, as will anyone who victimises a colleague by raising a concern through this procedure.

### **Your protection**

The publisher and CEO are committed to this policy. If it is a genuine concern, true claims and acted in good faith you will not risk damaging your position.

Otherwise, START does not guarantee this in the case of inappropriate motives and untruths.

### **Your confidence**

START will not tolerate the victimisation of anyone raising a genuine concern and anyone responsible for such conduct will be subject to disciplinary action.

You may decide that you want to raise a concern in confidence. Therefore, if you ask for your identity to be protected, it will not be disclosed without your consent. If a situation arises where it is not possible to deal with the concern without revealing your identity (for instance because your evidence is needed in court), there will be a discussion as to whether and how we can proceed.

This policy does not cover the situation where information about malpractice is received anonymously; discretion will be used in the investigation of such information.

## **Steps**

### **Step 1: Manage internal lines**

If you have concerns about malpractice actions (defined in the Policy statement section), we hope you feel able to connect them first to your line manager.

You can do this verbally or in writing. It will help if you make the facts clear. You can outline how you want it explored. If you have a direct or personal interest in this, you should tell us at this stage. If you are writing, you need to provide information on how you can be contacted.

### **Step 2: Alternate internal contacts**

If you feel unable to start a thing with someone from your immediate line management, for

whatever the reason, contact the CEO: Dario Novalić, CEO

Mobile: + 387 61 144 979

E-mail: [darionovalic.start@gmail.com](mailto:darionovalic.start@gmail.com)

**Step 3:** If you still think that things cannot be resolved internally, you can contact the Press Helpline <https://bhnovinari.ba/bs/>, and ultimately the Police and the competent prosecutor's office.

## **Feedback**

It is mandatory to respond to whistleblower reports and to investigate and take action within one month. Inform the whistleblower about everything.

*Denameda d.o.o  
La Benevlencije 6  
71000 Sarajevo  
Bosnia i Hercegovina*

*CEO: Dario Novalic*