



Protection of Whistleblowers

On 17 May 2023, the law transposing the Whistleblowing Directive was published in the Official Memorial. Since then, entities in the financial sector, public sector entities and entities from the private sector with at least 50 employees have to implement internal reporting channels.

The requirements of the law go far beyond existing legislation, e.g. persons can report “anything illicit” and channels should be accessible to both internal and external persons. The law foresees timeframes for feedback, requires strict confidentiality and an impartial person/department for handling alerts. Non-implementation will come with financial sanctions and potential reputational damage. To make the system effective, entities should think about an efficient technical set-up as well as proper training and communications to foster trust in the system which might otherwise be abused or not used at all.



Your challenges

- Is your existing whistleblowing system in line with the requirements of the new law?
- Are your training and communications encouraging a speak-up culture?
- Do you have sufficient and sufficiently trained people to monitor and investigate reports internally?
- Should you evaluate the use of adequate software for your whistleblowing system?
- Do you have a system for regular reporting as well as for ad-hoc escalation cases?
- Do you have experts to assist in internal investigations?
- Do you ensure the implementation of remedial actions and prevent retaliation against whistleblowers?
- Do you have a crisis plan in case of media coverage or public disclosures?



Our services

We can work with you to:

Implement your system from scratch

Support you in the drafting of your governance structure, policies & procedures;

Support you in the implementation of your reporting channel (advise on channel set up, text of your landing page and intake questionnaire);

Support you in the design and implementation of an adequate communication and training plan.

Perform a health-check of your existing system

Perform a gap analysis between your current system against the law and best practices (to review the policies and procedures in place, the set up of the whistleblowing tool, as well as the existing governance structure);

Test the efficiency and effectiveness of the channel.

Manage your channel and provide investigation support

Perform Managed Services for the handling and classification of incoming alerts;

Support you in internal investigations into allegations of misconduct.



Your benefits

Ensure compliance with the new regulatory framework to minimise the risk of fines.

Increase the impact of your whistleblowing system by applying market insights and best practices in order to ensure trust in and use of the system.

Implement a system which effectively allows you to detect misconduct early, remediate it internally and prevent or limit financial and reputational damage.

Build a robust whistleblowing system which will enhance your ESG efforts, improve your reputation and meet your stakeholders' expectations.



PwC and EQS Group have joined forces in a Joint Business Relationship (JBR) since August 2022, to offer a customizable solution for whistleblowing systems in line with the new Whistleblower Protection Law.



Why PwC Luxembourg?

Having our client interests in mind is what drives our business. This client centricity allows us to undertake this journey in collaboration with you and with the same objective: combat financial crime.

In addition, at PwC Luxembourg, we have a deep pool of specialists encompassing a broad range of skills, who are well recognised on the Luxembourgish market. If needed, we can also leverage our powerful international network. This allows us to tailor our approach to comply with your business operations constraints.

PwC provides innovative and advanced solutions for preventing and responding to Financial Crime incidents, remediating past deficiencies, developing enhanced operating models, and optimising monitoring systems.

For more information on all our whistleblowing solutions, please contact:



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