

ACUMEN4D WHISTLEBLOWER POLICY

1. Policy Statement

1.1 ACUMEN4D and its governing body, the Board of Directors (BOD), are committed to high standards of transparency, accountability, ethics and integrity. This policy is intended to inform staff, grantees, consultants, suppliers and other third parties of this commitment, to encourage reporting of possible violations at the earliest opportunity, and to lay out procedures for reporting and investigating complaints and the protections afforded to whistleblowers.

1.2 The whistleblower policy is read together with other ACUMEN4D ethics policies comprising of the Ethics Policy, Antifraud Policy, Anti-money Laundering Policy, Environmental and Social Management Policy, Code of Conduct, Safeguarding Policy and Sexual Harassment Policy. All ACUMEN4D stakeholders, including staff, grantees, consultants, suppliers and other third parties have a duty to immediately report any illegal or unethical conduct occurring in relation to ACUMEN4D.

2. Purpose of the Policy

2.1 The purpose of this policy is to;

- Provide for a culture of zero tolerance towards fraud, corruption, bribery and any malpractice or wrongdoing
- Explain what qualifies as a whistle-blow and guidelines on how to report a concern
- Encourage stakeholders to bring out information helpful in enforcing good corporate governance practices
- Provide a platform to disclose concerns of malpractices within the organization
- Explain the process followed in reviewing complaints received through the channels provided
- Mitigate against any fraud, operational or regulatory risk that could lead to potential financial loss or damage to the company's reputation.
- Reassure those who raise concerns in utmost good faith that they can do so without fear of reprisals or victimization or disciplinary action, regardless of whether these are subsequently proven

3. Policy Scope

3.1 This Policy applies to:

- a. All ACUMEN4D management and staff (including temporary staff)
- b. ACUMEN4D board members and donors
- c. All third parties dealing with ACUMEN4D including consultants, grantees, suppliers, partners or any other associates.

3.2 This policy supplements ACUMEN4D's Ethics Policy and grievance procedures described in the Human Resources (HR) Policies Manual and Safeguarding of Vulnerable Persons Policy.

3.3 Regardless of their level, type of employment or location, ACUMEN4D employees must be encouraged to report concerns or complaints regarding conduct by ACUMEN4D Board members, managers, staff, vendors, contractors, consultants or grantees which they believe:

- Is a breach of, or fails to implement, or does not comply with, the organization's governing rules, procedures, policies, or established standards of practice *e.g. accounting; procurement; grants making; human resources*; or
- Is illegal or unlawful conduct (*e.g. fraud, corruption*); or

- Is a breach of our Safeguarding of Vulnerable Persons Policy and Sexual Harassment Policy; or
- Is unethical or inconsistent with the standards the organization subscribes to under our Ethics Policy; or
- Is, or will result, in a waste of ACUMEN4D resources or pose a risk to the organization's reputation and integrity; or
- Are dangerous practices likely to cause physical harm or damage to a person or to property; or
- Is abuse of power or authority for any unauthorized or ulterior purpose; or
- Represents a conflict of interest; or
- Is an attempt to cover up any of the above.

3.4 Similarly, ACUMEN4D encourages its Vendors, Contractors, Consultants, Grantees and other third parties to report concerns or complaints they believe attain any of the examples outlined in section 3.3 above.

3.5 Where the matters being reported relate to: (a) employee grievances over decisions regarding the employee salary and benefits, employment status or other human resource issues affecting them; (b) discrimination, harassment and other offensive or disruptive behavior in the workplace; and (c) inter-personal difficulties between staff and their supervisors, or between staff members; these will be reviewed in accordance with the specific procedures established in the HR manual.

3.6 Matters that are reported relating to safeguarding of vulnerable persons including children shall be reviewed and investigated in accordance with the procedures established under ACUMEN4D's Safeguarding of Vulnerable Persons Policy.

3.7 Matters that are reported relating to sexual harassment shall be reviewed and investigated in accordance with the procedures established in the Sexual Harassment Policy.

3.8 Matters that are reported related to fraud shall be reviewed and investigated in accordance with the Anti-Fraud Policy.

3.9 Matters that are reported related to money laundering shall be reviewed and investigated in accordance with the Anti-Money Laundering Policy.

4. Definition

4.1. For the purposes of this policy, whistle-blowing is defined as the deliberate, voluntary disclosure of any suspected or anticipated misconduct within or associated with the organization that is within its ability to control. A whistleblower is any staff member, vendor, consultant, contractor, grantee or other third party that makes such a disclosure.

5. Reporting channels

5.1 A whistleblowing concern can either be made confidentially or anonymously;

- Full Disclosure – the whistle-blower's name is known and will be disclosed in the report
- Partially Anonymous - the whistle-blower's name is known but will not be disclosed, without their consent, unless required by law.
- Anonymous whistleblowing-the whistle-blower does not identify themselves to anyone at any stage.

5.2 If a whistleblowing concern is made anonymously, enough information must be provided to facilitate a thorough investigation on the allegations.

- 5.3 The following communication channels are available to individuals for reporting their concerns:
- a. The Independently managed whistleblower email, hotline and website.
 - b. The Whistleblower email box (info@ACUMEN4D.org)
 - c. Immediate supervisor
 - d. Department Heads or Section Managers
 - e. The Director Human Resources
 - f. Any other member of the Management Committee
 - g. The Managing Director

5.3 Employees are encouraged to convey their concerns in writing to their immediate supervisor in the first instance. If they are not comfortable doing so or if the concern relates to their supervisor, or if the supervisor has not acted on similar earlier complaints, employees may convey their concerns to their Department Heads or Section Managers.

5.4 In those instances, where they are not comfortable doing so or if the concern relates to their Department Heads or Section Managers, employees may make written reports to the Director, Human Resources, another member of the Management Committee or the Managing Director.

5.5 Vendors, Contractors, Consultants, Grantees and other third parties are encouraged to submit their concerns through the Whistleblower hotline or email address.

5.6 An individual may make a written submission to the Director, Human Resources or the independently managed whistleblower email, hotline or website, if he/she:

- a. Has grounds to believe that he/she will be subjected to retaliation by the persons he/she should report to under the established internal mechanism; or
- b. Considers it likely that evidence relating to the misconduct will be concealed or destroyed if it is reported under the internal mechanism; or
- c. Has previously reported the same information through the established internal mechanism and believes the organization failed to take appropriate action within a reasonable period of time.

5.7 All whistleblower accounts received through the channels outlined in 5.3 should be submitted to the Director, Human Resources for review. The Director, Human Resources shall report to the Executive Management Committee regarding any whistleblower report submitted to him/her.

5.8 Access to the whistleblower email account (info@ACUMEN4D.org) and the independently managed whistleblower channel reports will be restricted to the Director Human Resources and the Chair of the Executive Management Committee

5.9 Whistleblowers should endeavor to ensure that reports are factual, rather than speculative, and should contain as much specific information as possible to allow for proper review and investigation.

6 Review of Whistleblower reports

6.1 All whistleblower accounts received through the channels outlined in section 5 should be submitted to the Director Human Resources for review. The Director Human Resources shall report to the Executive Management Committee regarding any whistleblower reports submitted to him/her.

- If the case involves alleged wrongdoing by the Managing Director, the Director Human Resources will refer it to the Director Human Resources who, in consultation with the Managing Director, will determine whether an investigation should be conducted. The result of any such investigation shall be submitted to the Chair of the Executive Management Committee who, in consultation with members of the Board, will decide what action to take.
- Where the report relates to the Head of Internal Audit and/or the Chair of the Audit Committee, the course of action will be determined by the Chair of the Audit Committee and/or Chairman of the Board respectively.

6.2 The Head of Internal Management Unit in collaboration with the Chair of the Management Committee will assess the nature of the complaint and determine the course of action which includes;

- Immediately initiate investigations on the reports. The investigations may be conducted by the organization internal team, an outsourced party and/or referred to national authorities for prosecution in the event of a breach of national criminal laws.; or
- Forward of the complaint to the Committees established under the organizations' ethics policies for action.

6.3 Investigations will be conducted in a professional manner following a systematic and analytical process designed to gather information in order to determine whether wrongdoing occurred and, if so, the persons or entities responsible. The investigations should be conducted within 30days on receipt of the report unless otherwise approved by the Chair of the Management Committee.

6.4 The results of the investigations will be presented to ACUMEN4D management and the board through the Chair of Management Committee for action which may include disciplinary action (up to and including termination of employment or service) against any person found to have engaged in unethical conduct or misconduct. Where appropriate, reporting of such misconduct to the relevant civil or criminal authorities should be done. There will be no action taken on alleged reported individual if the results of the review proves that the reports are unfounded. Management will report to the board through the Management committee of the action taken on the investigation results within 30 days of receipt of the investigation report.

6.5 It is strongly recommended that individuals identify themselves when reporting their concerns as this facilitates the investigation of the matter being raised. They may, however, choose to remain anonymous. Anonymous reports, however, will require careful scrutiny as to whether or not they merit further action or escalation based on the evidence presented by the report and the seriousness of any allegation.

7 Feedback to the whistleblower

7.1 ACUMEN4D recognizes the right of the whistleblower to receive confirmation that the matter has been properly addressed. Therefore, he/she will be given as much feedback as is appropriate under the circumstances, subject to legal constraints.

8 Protection against retaliation

8.1 In making their reports in good faith, individuals are discharging their duty to protect and serve the Organization. ACUMEN4D will therefore respect, protect and keep confidential the identity of individuals who make such reports, and must ensure that there is no retaliation against them. Breaches in this regard will be treated as serious violations and will be subject to disciplinary provisions.

8.2 If a situation arises where the matter cannot be resolved without revealing the whistleblower's identity, the Organization will first discuss with him/her whether, and how best, to proceed.

9 Actions not protected under the policy

9.1 Where a whistleblower makes a report under this policy in good faith, reasonably believed to be true, there will be no action taken against him/her should the disclosure turn out to be inaccurate. Good faith shall be deemed lacking when the whistleblower does not have personal knowledge of a factual basis for the report or where he/she knew or reasonably should have known that the report is malicious, false, or frivolous. The organization will regard the making of any deliberately false or malicious allegations as misconduct, which may result in disciplinary action.

9.2 If a whistleblower has any personal interest in the matter he/she must make this clear at the time the alleged misconduct is reported. The act of whistle-blowing will not shield whistleblowers from the reasonable consequences flowing from any involvement in misconduct. An individual's liability for his/her own conduct is not affected by his/her disclosure of that conduct. However, in some circumstances, an admission may be a mitigating factor when considering disciplinary or other action.

10 Implementation of this policy

10.1 The Managing Director will ensure that the policy is adequately communicated and appropriate procedures put in place to ensure proper implementation of this policy.

10.2 The Director Human Resources will communicate other appropriate procedures aimed at ensuring proper implementation of this policy.