

WHISTLEBLOWER POLICY	
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Where employees can access this policy:	HR Teams drive

DRAFT WHISTLEBLOWING POLICY

1. WHAT IS A WHISTLEBLOWER?

A whistleblower is anyone who has and reports insider knowledge of illegal and unethical activities occurring in an organisation. Whistleblowers can be employees, suppliers, contractors, clients, or any individual who becomes aware of illegal business activities.

2. SCOPE OF POLICY

This policy is designed to enable employees and third parties (donors, suppliers, contractors, partners, and others) to raise concerns and disclose information that the individual believes shows malpractice or impropriety. This policy does not apply to personal grievances concerning an employee's terms of employment or other aspects of the working relationship that are subject to the current Human Resource and Grievance policies and procedures within the EWT. This policy deals with specific concerns which are in the public interest and may include:

- Financial or non-financial mismanagement, fraud, and corruption, including bribery
- Failure to comply with statutory obligations/requirements
- Improper conduct or unethical behaviour (outside of HR policies)
- Health and safety risks
- Environmental damage
- Attempts to conceal any information relating to the above

This policy is not a substitute policy for issues governed by existing EWT policies and procedures.

3. WHO CAN RAISE A CONCERN?

An employee, donor, supplier, or any other interested party who reasonably believes that there is serious misconduct relating to any of the above matters may raise a concern in terms of the procedure set out below. Concerns must be raised without malice and in good faith. The individual making the disclosure must reasonably believe that the information and the allegations contained therein are substantially accurate and should have evidence where possible to substantiate the claim.

4. CONFIDENTIALITY

The EWT will treat all such disclosures confidentially and sensitively. Every effort will be made, subject to any legal constraints, not to reveal the whistleblower's identity without their permission. Circumstances may, however, dictate that in time it may be necessary for their identity to become known, i.e., as they may have to be called as a witness.

5. PROTECTION

The whistleblower will have nothing to fear as they would be acting as a responsible stakeholder. The EWT will protect the whistleblower by not tolerating any harassment or victimisation. If, however, an allegation is maliciously or mischievously made for personal gain or otherwise, appropriate disciplinary or legal action may be taken against the whistleblower.

6. REPORTING ANONYMOUSLY

The EWT treats all disclosures confidentially; however, it recognises that it may be the whistleblower's preference to report anonymously in certain circumstances. In exercising this discretion, the factors to be considered would include:

- The seriousness of the issues raised;
- The detail and amount of information provided; and
- The ability to confirm the allegation from other sources.

It is both the responsibility of the whistleblower and the EWT to ensure anonymity.

7. PROCEDURE

The EWT has an online form for whistleblower disclosures on Teams and our website (these allow for anonymous disclosures), which will be directed to the HR Manager.

The HR Manager will present the information received to the authorised persons (Exec, CEO, SEC and or the Board) in the form of summarised reports with evidence.

Where it is not appropriate or possible for the report to be submitted online, forms may be submitted by hand.

In the case of hand-delivered reports, it is important to ensure the report is submitted to the appropriate manager authorised to deal with the report:

Reports involving:

- All employees (including the Executive Management Team and Programme Managers) to the HR Manager or CEO
- The CEO to the Chairman of the Board
- Organisational concerns to the HR Manager or CEO,

Whistleblowers may disclose information anonymously; however, employees are encouraged to provide their names and contact details, especially if further investigation is required.

Where appropriate and deemed necessary by the Executive Management Team: matters raised will be investigated by management through an internal audit team or referred to other investigating authorities in certain circumstances.

8. THE RESPONSIBLE PERSON

The EWT Human Resources Manager will have overall responsibility for the maintenance and operation of this policy and maintain a record of concerns raised, which does not endanger the whistleblower's confidentiality and report as necessary to the EWT's CEO or the Board.