

 KNOWLEDGE TRANSFER	Document Whistleblowing Policy & Procedure	Effective Date 1st August 2020
	Function KT- Human Resources	Status Final

Whistleblowing Policy & Procedure

Policy Statement

This policy is primarily for concerns or disclosures where the interest of EWS-KT is at risk. If any employee believes that one or more of the following matters (as below*) is either happening now, took place in the past or likely to happen, they can raise the concerns as a part of the policy.

- a criminal offence
- the breach of a legal obligation
- a breach of the Code of Conduct
- a miscarriage of justice
- a danger to the health and safety of any individual
- serious damage to the environment like dumping waste whilst in field and causing harm to communities
- deliberate concealment of information tending to show any of the above six matters

Scope

This policy applies to all employees, third party staff, consultants or volunteers. Representatives of EWS-KT that are contractors, distributors, vendors, donors or partners can raise their concerns using this policy.

Reporting concerns

- Any serious concerns about safeguarding, malpractice, theft or fraud which might adversely affect EWS-KT's work or reputation or might otherwise put at risk the health or safety of anyone, should first raise it in confidence with their line manager or team leader. This may be done verbally or in writing.
- If the individual raising the concern feels unable to raise the matter with his/her manager, for whatever reason, the matter should be raised through alternate mechanisms of raising concerns. Complaints can also be sent to any of the named persons below:
 - Stuart Morris, Director KT, Stuart.Morris@eastwestseed.com
 - Rutger Groot, Chairperson, Rutger.Groot@eastwestseed.com

Responding to concerns

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- EWS-KT will acknowledge the concerns within 5 working days of the receipt.
- Once a concern has been received it will be assessed and considered with regards to appropriate action to be taken. The process for the investigation will depend on the type of complaint being made and the policy under which it is being investigated.
- The named person who has been contacted will make every effort to deal with such disclosure in a fair & objective manner by investigating the matter as quickly as possible or nominating an appropriate person to do so.
- When a Representative raises a concern, it will be helpful to know how they think the matter might best be resolved. If they have any personal interest in the matter, we do ask that this is disclosed at the outset.
- Whenever possible, the representative, raising the concern, will be given feedback on the outcome of any investigation without breaching confidentiality or putting anyone at risk.
- Based on the seriousness of the matter a report will be shared with the board. The related policy of Safeguarding, Anti-Fraud & Anti- Corruption or Disciplinary will be applicable as appropriate.

EWS- KT assurance

- The Board and KT Director are committed to this policy. If EWS-KT representatives raise a genuine concern under this policy, they will not be at risk of losing their jobs or suffering any form of retribution as a result. EWS-KT will not tolerate the harassment or victimisation of anyone raising a genuine concern.
- Non Retaliation-
 - No director, officer, employee, volunteer, or contractor who in good faith reports a violation of EWS policies, or law shall suffer harassment, retaliation or adverse employment consequences.
 - An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.
 - This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within EWS as the first step.

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- EWS-KT actively promotes accountability and good practice in the workplace and wishes to ensure that concerns about suspected serious malpractice, illegal or dangerous practices can be properly raised by Representatives and addressed before the public interest is affected. EWS-KT will make every effort to thoroughly investigate and deal seriously with such concerns, raised in good faith and through the following procedure, in a fair, objective and discreet manner.
- Confidentiality & Anonymity
 - All matters will be treated confidentially and breach of which is dealt with seriously and can lead to disciplinary action, upto termination
 - Representatives raising a concern should understand that there may be times when EWS-KT is unable to resolve a concern without revealing their identity, for example where personal evidence is essential. In such cases, EWS-KT representatives will discuss whether and how the matter can best proceed with the individual raising the concern.
 - If a concern is reported anonymously it is difficult for EWS-KT to provide and ensure assurances. To be fair and consistent to all parties it is important that the individual(s) raising the concern does not seek anonymity. If the individual raising the concern does not tell us who they are it is considerably more difficult to look into the matter. It is also more difficult to protect that individual's position on the issues of concern or to give them feedback.

EWS-KT reserves the right to change this policy from time to time, in line with the latest EWS Group related policies.