

<h1>Whistle Blower Policy</h1>	
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Distribution	Policy Number	Policy Duration	Policy Revise Date
All Divisions, Subsidiaries and Affiliate/Associate Organisations	<b>POL WB</b> 001/2024/5	1 April 2025 – 31 March 2030	Annual
<b>Policy Status</b>		<b>Maintained by</b>	
Approved		GL Regional Hub	

The signatures below certify that this document has been reviewed and accepted and demonstrate that the signatories know all the requirements and are committed to ensuring their provision.

<b>Prepared by</b>	Name	<b>Debrah Mukuku</b>	Signature	
	Role	<b>Director GL Regional Hub</b>		
<b>Reviewed by</b>	Name	<b>Colleen Lowe Morna</b>	Signature	
	Role	<b>Special Advisor</b>		
<b>Approved by</b>	Name	<b>Gender Links Board</b>	Signature	
	Role	<b>Board of Directors</b>		

These policies are based on the laws in all the countries where GL operates. If there is a conflict between the policies and national laws, the national laws will take priority, unless the policies have been standardised across countries in the interest of fairness. All GL employees, associates, and consultants must adhere to GL Policies as outlined in their contracts. This policy should be read in conjunction with all relevant policies.

## **1. Purpose**

Gender Links requires Board Members, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the Gender Links, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

## **2. Reporting Responsibility**

This Whistle Blower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that Gender Links can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees and volunteers to report concerns about violations of Gender Links' Code of Conduct or suspected violations of laws or regulations that govern Gender Links' operations.

## **3. No Retaliation**

It is contrary to the values of Gender Links for anyone to retaliate against any board member, officer, and employee or volunteer who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of Gender Links. 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.

## **4. Reporting Procedure**

- Gender Links has an open-door policy. Employees should share their questions, concerns, suggestions or complaints with their supervisor.
- GL has an anonymous, secure reporting link here: <https://survey.alchemer.com/s3/7545158/GL-Complaints-Form>
- The Director, Gender Links Regional Hub will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.
- The Director, GLRH will report quarterly to the Audit Committee on compliance activity relating to accounting or alleged financial improprieties.

## **5. Accounting and Auditing Matters**

The Director, GL Regional Hub shall immediately notify the Audit Committee/Finance Committee of any concerns or complaints regarding corporate accounting practices, internal controls or auditing and work with the committee until the matter is resolved.

## **6. Acting in Good Faith**

Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offence.

## **7. Confidentiality**

Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. Handling of Reported Violations.