

Whistleblowing Policy

This policy is intended to encourage HelpZone people and others to report suspected or actual occurrence(s) of illegal, unethical or inappropriate behaviours or practices without retribution. These might relate to criminal offence, failing to comply with legal obligation, disclosure related to miscarriages of justice, any form of discrimination, health and safety of the public and other employees, damage to the environment, unauthorised use of public funds or other assets, fraud and corruption, neglect or abuse of clients, as well as any other unethical conduct. HelpZone views whistleblowing as a positive act making a valuable contribution to its efficiency and long-term success and it is consistent with its commitment to achieving the highest possible standards of service and the highest possible ethical standards in public life and in all of its practices. This policy is intended for HelpZone employees, consultant, board members, independent contractors and person acting on behalf of the company, as well as any members of the general public who have interest in or concern for HelpZone.

Any concern might be promptly informally risen by telephone, in person or in writing with the line manager first who will treat the issue in confidence. The issue might also be referred to any more senior figure if the manager is deemed to be an inappropriate person to talk to. The whistle-blower might provide the following information: the nature of the concern and reasons proving that; the background and the history of the concern. It is important noting that although the whistle-blower is not expected to prove beyond doubt the truth of his/her suspicion, he/she will need to demonstrate the authenticity of the concern as well as that there are reasonable grounds. The whistle-blower has the right to be accompanied by trade union, professional association representative or any other individuals during any meetings or interview related to the raised concern. The whistle-blower retains the right to report the event anonymously, as well as to address the issue to the dedicated email address (info@helpzone.org) on the basis of which a confidential report will be sent to HelpZone. However, if disciplinary or other proceeding will follow the investigation, it may be not possible to take action without the whistle-blower who may be asked to witness. It is worth mentioning that this policy it is not ideally suited to concerns raised anonymously as they are less powerful. Line managers or board members receiving the confidential report must promptly act to investigate and resolve the issue and the whistle-blower shall receive a follow-up report within 10 business days. The investigation will be carried out under terms of strict confidentiality by not informing the subject of the complaint until it becomes necessary. In certain specific cases, suspension from work may have to be considered immediately. Where appropriate the matters raised may: be investigated by management or internal audit; be referred to the police; be referred to the external auditor; form the subject of an independent inquiry.

If following the investigation of the whistle-blower is not satisfied with any action taken, he/she retains the right to address the matters outside HelpZone and refers the matter to external auditors, the police, or any other relevant bodies prescribed by legislation. It is worth mentioning that in case of public disclosure, it is forbidden to disclose information that is confidential to HelpZone or to anyone else such as client and contractors.

HelpZone assures that the whistle-blower does not receive retaliation or retribution for a report that was provided in good faith, as well as that anyone retaliating against him/her will be subject to discipline measures. HelpZone will also consider temporarily re-deploying the whistle-blower for the period of the investigation if necessary. A whistle-blower who makes a report that is not done in good faith is subject to discipline measures, or other legal means to protect the reputation of HelpZone. Equally, any

consultant, contractor or third parties making a malicious or frivolous report is liable to having its contract terminated.