

HACOF WHISTLEBLOWER POLICY

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1. Objectives

HACOF expects each employee, contractor, vendor or supplier to comply with the policies and procedures herein and is committed to promoting honesty and integrity and maintaining highest ethical standards in all its activities.

HACOF has zero tolerance to any illegal or unethical behaviour including fraud, criminal acts, policy violations, manipulation of accounting and auditing records or any breach of the code of conduct or any other policies, procedures or practices established by the organization.

2. Definitions

Organization means or refers to HACOF as an entity.

Code refers to the code of conduct adopted by HACOF board and management.

Reporter refers to the employee or contractor reporting incidents under the whistleblower policy.

Incident means one or more violations or suspected violations of the code, applicable policies such as HACOF accounting, financial reporting, internal controls, human resources procedures or related matters.

Investigators refers to the person or persons designated by the HACOF senior members with responsibility for investigating and bringing closure to reported incidents.

Policy means this *whistleblower policy*

3. Application

This policy applies to each incident reported and the procedures, protections and other provisions this policy are for the benefit of every employee or contractor of the organization.

4. No Retaliation

HACOF will not, in relation to the reporting of any incident under this policy permit any form of retaliation or retribution including discharge, demotion, transfer, suspension threat, intimidation, harassment or any other form of discrimination by any person or group directly or indirectly against any reporter, witness or interviewee.

The no retaliation policy is applicable to any person that;

- Reports an incident in accordance with this policy

- Provides information or assistance in an investigation regarding any conduct which the reporter reasonably believes constitutes a violation of applicable policies and procedures, and the code of conduct.
- Files, testifies, participates or assists in a proceeding related to a violation of the code.
- Assists the investigator or committee, management or any other person or group in the investigation of an incident.

Any employee or contractor who retaliates against a reporter witness or interviewee could face disciplinary action up to and including termination of employment. If anyone believes that retaliation has occurred must submit a complaint or report such occurrence immediately.

5. Reporting Incidents

Incidents must be reported promptly by reporters to someone who can address the properly. In most cases involving an employee reporter, this will be the employee's supervisor. In an employee believes that in the circumstances it would not be appropriate to report an incident to their supervisor, the employee reporter may report the incident to the operations and compliance department or Director or any senior member of the organization whom the employee believes would be appropriate to report the incident.

Where a supervisor or other member of management receives an incident report, it must be promptly forwarded to Managing Director. Suspected fraud or violations of policies should be promptly reported directly to the Operations Director.

The reporter may report their concerns under this policy through several channels. They should choose the channel that is most appropriate given the nature of their concern. HACOF has established the following reporting channels where employees and contractors can report directly or anonymously;

- Directly to the supervisor
- Directly to senior members – Operations Director
- Anonymously via internet using the whistleblower email – reportanincident@hacof.com or hotline +252616 770800 that is accessible to all and which the organization operates 24 hours a day, 7 days a week.

If a report is submitted anonymously, the identity of the individual raising the concern, the reporter through the hotline is not known to the organization. The reporter will be provided with a confidential PIN number that will allow for the further anonymous communication through email or the hotline. Concern raised through the hotline are submitted to the Operations Director and/or Managing Director who will initiate and ensure independent review, investigations and disposition.

Access to incident reports will be strictly controlled to prevent interference with and ensure the independence, effectiveness and integrity of the ensuing incident investigation.

6. Investigation and Oversight

The Managing Director and/or Operations Director are designated as the investigators for incidents pertaining to violation of the code and other organization wide policies and procedures. The Board and CEO have the right appoint any other person to conduct the investigations and they will ensure that no person will be appointed to investigate an incident where that person is or could reasonably be perceived to be in conflict of interest or otherwise not impartial or unbiased in conducting the investigation.

The designated investigator will conduct his/her investigations in an independent, expeditious and confidential manner taking care to protect the identity of the person(s) involved in accordance with this policy and to ensure that the investigation is not impaired in any manner. The investigator will contact the reporter to acknowledge receipt of the incident report within 2 business days.

A reporter who reports an incident through a third party or anonymously, will be assigned a unique case identifier or PIN or Password and will use this unique identifier throughout the investigation process. All incidents will be promptly investigated and appropriate corrective measures will be taken if warranted by the outcome of the investigation. The reporter must fully cooperate with the investigator's investigation. The investigator may involve other persons in the investigation as deemed appropriate. Any involvement of external or third parties will require authorization of the CEO and Managing Director.

The status and the outcome of an investigation will be communicated to the reporter in a timely manner either through direct communication i.e. if the reporter provided his or her name or via third party in the case where the reporter reported via third party or anonymously using the hotline or email. Responses to anonymous reports will be made using the same unique identifier or PIN assigned at the point of reporting.

7. Acting in Good Faith

A reporter must act in good faith and have reasonable grounds for believing that the information disclosed is true. Incidents found to have been made in bad faith, maliciously or which were known to be false when made will be viewed as a serious offence that could give rise to disciplinary action up to and including termination of employment with the organization.

8. Confidentiality and Anonymity

All incident reports will be treated as confidential and each report and the identity of the reporter will be kept confidential to the extent permissible and feasible to permit proper investigation and resolution. Reports will only be accessible to people that the investigator determines have a “need to know” and where such access will not otherwise compromise or interfere with the independence, effectiveness and integrity of the investigation. Essentially, a need to know arises from an obligation to investigate or to take remedial action based on the information contained in the incident report.

Reports of incidents must be supported by the sufficient information and evidence to enable a proper investigation, particularly in the case of anonymous incidents since the investigator may not be able to seek further details from the reporter. Incident report should include:

- Date(s) of the incident.
- Identity of individuals and witnesses involved.
- A description of the specific actions or omissions that constitute the incident.
- how the reporter became aware of the incident.
- any steps taken by the reporter to date with respect to the incident.
- any materials or documents relevant to support or evidence the incident.

It is important to note that while this policy facilitates anonymous reporting and protects the reporter anonymity, such measures may hinder the effective investigation of an incident. Also, as practical matter, it is possible that the identity of an anonymous reporter may become known during the investigation or resolution or may be subject to legal disclosure requirements. Therefore, HACOF encourages reporters to only report anonymously where necessary given the inherent difficulty in properly investigating, following up and resolving anonymously reported incidents. If a reporter remains anonymous and does not provide sufficient detail regarding the incident, the investigator may not be able to initiate or complete a comprehensive incident investigation.

9. Retention of Records

Records pertaining to an incident are the property of HACOF and will be retained in compliance with applicable financial, accounting, human resources policies and procedures. They will be subject to safeguards that ensure their confidentiality and when applicable the anonymity of the reporter and to maximize their usefulness to the organization’s overall compliance requirements.

10. Policy Review

This policy will be reviewed annually along with updates to the Code of Conduct and any other relevant policy document.