Whistleblowing Policy

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Introduction

MannionDaniels works for a more healthy, equitable, inclusive, safe and sustainable world. We partner with communities and clients worldwide to provide advice and support in strategic planning, policy governance, and programme management, with a particular focus on international health and social care. Much of our work focuses on reaching poor and vulnerable people, especially in fragile and conflict affected states.

MannionDaniels is committed to conducting business with honesty and integrity and we expect all staff to maintain high standards in accordance with our policies and procedures. This Whistleblowing Policy is designed to support our company's commitment to upholding ethical values and practices, ensure Employees, Business Partners and Representatives can feel comfortable raising concerns without fear of retribution, and provide a transparent and confidential process for dealing with concerns including, but not limited to: corruption, fraud, human trafficking, slavery, health and safety, safeguarding children and young people abuse and concerns, and terrorism funding.

Scope of Policy

The purpose of this policy is to:

- The Public Interest Disclosure Act, which came into effect in 1999, gives legal protection to employees against being dismissed or penalised by their employers as a result of publicly disclosing certain serious concerns. The Company has endorsed the provisions to ensure there is no feeling of being at a disadvantage when raising legitimate concerns.

- This policy applies to all employees of MannionDaniels wishing to raise a concern regarding malpractice or wrongdoing within the organisation. It also includes those on secondment, external consultants, contractors, suppliers and agency staff working with MannionDaniels.

- This policy is intended to assist individuals who believe they have discovered malpractice or wrongdoing. It is not designed to question financial or business decisions nor should it be used to reconsider any

- matters which have already been addressed under harassment, complaint, disciplinary or other procedures. It is designed to enable staff to raise concerns internally, and at a high level, to disclose information which the individual believes shows malpractice or impropriety which contravenes our code of business ethics.

- This policy is intended to cover concerns which are in the public interest and may at least initially be investigated separately but might then lead to the invocation of other procedures e.g. disciplinary.

- If your complaint is a safeguarding concern regarding suspected abuse, please read our Safeguarding Policy and contact the Designated Safeguarding Lead on (matthew.wiltcher@manniondaniels.com or safeguarding@manniondaniels.com).

Definition

Whistleblowing is the disclosure of information which relates to suspected wrongdoing in the workplace. This may include (bus is not limited to)

a. Criminal activity
b. Failure to comply with any legal or professional obligation or regulatory requirements
c. Miscarriages of justice
d. Danger to health and safety
e. Danger to the environment
f. Bribery

g. Financial fraud or mismanagement
h. Breach of internal policies and procedures
i. Unauthorised discloser of confidential information
j. Negligence
k. The deliberate concealment of any of the above

Individuals who become aware of wrongdoing can be fearful of raising concerns but there is legislation in place to protect employees including the Public Interest Disclosure Act 1998 (PIDA) and the Enterprise and Regulatory Reform Act 2013 (ERRA), whereby employers can be held liable for the harassment or victimisation of employee whistle blowers by their colleagues. Co-workers who victimise whistle blowers will also be personally liable and may become parties to a claim along with the employer.

Policy Statement

Every employee has a duty to speak up about genuine concerns in relation to wrongdoing. It is important for these issues to be resolved internally, as far as possible, as a matter of best practice. An employee making the disclosure will be protected under PIDA if they have an honest and reasonable suspicion that the malpractice has occurred, is occurring or is likely to occur. Concerns raised will be treated seriously and those raising them will be treated fairly and justly. However, where a false and malicious allegation is raised disciplinary proceedings may be instigated.

Safeguards

It is recognised that raising a concern may be a daunting and difficult experience but this policy is designed to ensure protection from victimisation and MannionDaniels will ensure concerns are taken seriously, will never attempt to conceal evidence of poor or unacceptable behaviour or practice, take disciplinary action where an employee destroys or conceals evidence of unacceptable practice or misconduct and ensure confidentiality clauses in employment contracts do not restrict, forbid or penalise whistleblowing.

MannionDaniels is committed to investigating all incidents that are

reported. The investigating officer will be the Operations Director

supported by the Compliance Manager. All reports will be dealt with

in confidence and only those who need to know will be informed.

Protection

- This policy is designed to offer protection to those employees of the Company who disclose such concerns provided the disclosure is made:
    - in good faith
    - in the reasonable belief of the individual making the disclosure that it tends to show malpractice or impropriety and if they make the disclosure to an appropriate person (see below). It is important to note that no protection from internal disciplinary procedures is offered to those who choose not to use the procedure. In an extreme case, malicious or wild allegations could give rise to legal action on the part of the persons complained about.

Confidentiality

- The Company will treat all such disclosures in a confidential and sensitive manner. The identity of the individual making the allegation may be kept confidential so long as it does not hinder or frustrate any investigation. However, the investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence required.

Anonymous Allegations

- This policy encourages individuals to put their name to any disclosures they make. Concerns expressed anonymously are much less credible, but they may be considered
- at the discretion of the Company. In exercising this discretion, the factors to be taken into account will include:
    - The seriousness of the issues raised
    - The credibility of the concern
    - The likelihood of confirming the allegation from attributable sources

All efforts will be made to ensure that only those investigating the concern know the identity of the whistle blower. There may however be instances when it will become necessary to reveal the identity of the person raising the concern. The investigating staff will discuss this with the individual concerned before doing so and will take all reasonable steps to ensure that they suffer no detriment.

Untrue Allegations

- If an individual makes an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against that individual. In making a disclosure the individual should exercise due care to ensure the accuracy of the information. If, however, an individual makes malicious or vexatious allegations, and particularly if he or she persists with making them, disciplinary action may be taken against that individual

Whistleblowing Procedure

- Any reasonable suspicions of malpractice or wrongdoing should be reported in writing or orally initially to your line manager or senior responsible officer for projects or grants. If you do not feel your line manager is the appropriate person you should directly approach a Director of the company or use one of the options under the section '**How to raise a concern'**.
- Where the complaint is against a senior manager or Director a suitable alternative Director or senior manager will be appointed to investigate to ensure impartiality and free from conflict of interest.
- If a concern is raised orally the appropriate line manager will take detailed notes and pass this information to the investigating officer.
- Where there are occasions involving an anonymous disclosure the information should be passed to the investigating officer.
- The investigating officer will need to establish and record the basis of the concerns that have been raised. The person raising the malpractice concern may be accompanied at any fact-

finding meeting(s) by a fellow employee. The fellow employee attending any such meetings will be bound by confidentiality and may confer with the person making the claim but may not answer questions on their behalf.

- The investigating officer will establish any further actions that should be taken to ensure a thorough investigation; the main objective will be to ascertain whether malpractice has occurred and whether the matter should be dealt with by the policy or internally. Where it is clear the police should be involved the investigating officer should notify them at the earliest opportunity. Caution must be exercised to ensure internal investigations do not compromise an investigation by the police.
- The investigating officer will take a written report containing the findings of the investigations and reasons for any judgement. The report will be passed to the relevant Director who will decide what action should be taken.
- MannionDaniels will aim to keep the complainant informed of progress and the outcome of the investigation where appropriate. However, sometimes the need for confidentiality may prevent specific details being given. Any information given to the complainant should be treated as confidential.
- Where the complaint is shown to be justified disciplinary proceedings may be invoked against the subject of the complaint. It is important to remember the boundaries of confidentiality when pursuing disciplinary action with an individual and it will be inappropriate to disclose full details of any action taken against the subject of a complaint or concern.
- If the complainant is not satisfied that their concern is being properly dealt with by the investigating officer, they have the right to raise it in confidence with the Managing Director.
- If there is evidence of criminal activity, then the investigating officer may inform the police. The Company will ensure that any internal investigation does not hinder a formal police investigation.
- If the investigation finds the allegations unsubstantiated and all internal procedures have been exhausted, but the complainant is not satisfied with the outcome of the investigation, the Company recognises the lawful rights of employees and ex-employees to make disclosures to prescribed persons (such as the Health and Safety Executive, the Audit Commission, or the utility regulators), or, where justified, elsewhere.
- The investigating officer, should as soon as practically possible, send a written acknowledgement of the concern to the complainant and thereafter report back to them in writing the outcome of the investigation and on the action that is proposed. If the investigation is a prolonged one, the investigating officer should keep the complainant informed, in writing, as to the progress of the investigation and as to when it is likely to be concluded.
- All responses to the complainant should be in writing and sent to their home address

How to Raise a Concern

- As described above, MannionDaniels encourages anyone with a concern to raise this internally in the first instance with their line manager of a Director.
- However, anyone in doubt can seek advice from the independent whistleblowing charity 'Public Concern at Work' who operate a confidential helpline. They can be contacted by telephone (+44 (0) 20 7404 6609), email (whistle@pcaw.co.uk) or online (www.pcaw.co.uk).
- All employees, consultants, contractors, suppliers, and associated person(s) for the company anywhere in the world, are expected to report any suspected malpractice or wrongdoing and to cooperate with any investigation of such concerns. Concerns can be raised by contacting

a line manager, senior responsible officer, or the Operations Director. Timely notification permits MannionDaniels to resolve issues expeditiously. Timeliness also permits MannionDaniels to inform clients of possible malfeasance that may require their involvement.

- MannionDaniels have an reporting facility monitored by the Fiduciary Risk Team. To report a serious incident concerning a potential breach of company policy, bribery, conflict of interest, corruption, fraud, money laundering, terrorism finance, misuse of funds, a security issue or malpractice, please report via: whistleblowing@manniondaniels.com

Responsibilities

MannionDaniels Directors, senior managers, and line managers will take appropriate action to ensure compliance with this policy. The Operations Director and Compliance Manager will promote and monitor compliance with this policy and determine when actions have occurred that are in violation of this policy. All other MannionDaniels employees, consultants, contractors, suppliers, agency staff, and associated persons will ensure their individual compliance with this policy.

Communication and Training

MannionDaniels ensures that its whistleblowing and associated policies and procedures are embedded and understood throughout the company through internal and external communication, including training that is proportionate to the risk it faces. The Operations Director with support of the Compliance Manager will be responsible for providing ensuring employees receive appropriate training and for the communication of the Company's Whistleblowing Policy and other relevant policies to associated persons such as contractors and suppliers.

Review of Policy

The whistleblowing policy will be reviewed on an annual basis, or more frequently if changes to the legal or operating environment justify a review.