

THE EAST AFRICAN FUND LIMITED

ACN 620 147 775

Whistleblower Policy

1. Purpose

The East African Fund Limited (“EAF”) is committed to creating and maintaining a transparent, open and accountable working environment. EAF expects all its directors, staff and volunteers, and those of the School of St Jude and any of its international partners (collectively called “International Partners”), to report concerns about a serious breach to a senior manager or a director. EAF also encourages other stakeholders to report concerns in good faith. The purpose of this policy is to provide information to assist anyone who wishes to report concerns about a serious matter or breach.

2. How to make a report

Where a person feels unable to raise a concern through standard feedback channels because of reasonable grounds to fear reprisal, he/she may email his/her concern to info@eaf.org.au where it will be dealt with by the Board of Directors of EAF in accordance with this policy.

A person who wishes to raise a concern about EAF can also contact the Australian Charities and Not-for-Profits Commission using its online link - <https://www.acnc.gov.au/raise-concern/concerns-about-charities/how-raise-concern> or by phoning 13 22 62.

This policy will be available on EAF’s website and/or upon request; and reviewed regularly by the Board of Directors of EAF.

3. Reports by Whistleblowers

1. Whistleblowers considering making a report **must** have reasonable grounds for believing the allegation has occurred or is about to occur.
2. Whistleblowers **must** indicate they are making a protected disclosure of a serious matter (refer to the examples of serious matters or breaches below).
3. Whistleblowers **must** ensure as far as possible that allegations are factually accurate, complete, from first-hand knowledge and are presented in an un-biased fashion.
4. All allegations **will** be treated seriously and be subject to a thorough investigation.
5. A Whistleblower or any other person who has participated in good faith in an investigation **will** not be subject to a reprisal.

6. Online reports are preferable, however if a verbal report is made, it **must** be documented in the form of a witness statement and signed by the whistleblower.

The **confidentiality** of the person making a report will be respected, however there may be instances where it is necessary to reveal his/her identity to a limited group to enable a fair and thorough investigation, lessen a serious threat to a person's safety and/or is required by law. While anonymous reports may be made, they may be more difficult to investigate if the information provided is unclear or insufficient.

Any allegation that a person has engaged in a reprisal contrary to the requirements of these guidelines will be investigated and the matter treated seriously. If proven to have occurred, it will expose the wrongdoer to the risk of a disciplinary response including termination of employment.

If a whistleblower is found not to have acted in good faith or to have made a false allegation (including if made maliciously, vexatiously or without reasonable cause), the whistleblower may be exposed to a disciplinary response including termination of employment or position with EAF.

4. Examples of Serious Matters or Breaches which may be raised under this policy

Serious breaches may include (but are not limited to) conduct that:

- breaches EAF's Child Protection Policy, or any policy of any of EAF's International Partners which is designed to protect children and other vulnerable persons;
- breaches EAF's Policy on Safeguarding against Terrorism Financing; or any policy of any of EAF's International Partners which is designed to prevent terrorism financing, money-laundering or any other financial impropriety;
- is dishonest, fraudulent, corrupt, illegal or unethical;
- involves mismanagement or waste of EAF funds;
- could cause financial or non-financial loss to EAF;
- is materially detrimental to the interests, reputation and good standing of EAF;
- is an abuse of authority, position or information; or
- poses a serious risk of harm to an employee, beneficiary or volunteer of EAF, or any of its International Partners, including to their health, safety or environment.

5. Legislative Requirements

Under the Corporations Act 2001, a whistleblower policy must include information about:

- protections available to whistleblowers;
- how and to who the whistleblower may make the disclosure;

- how the company will support whistleblowers and protect them from detriment;
- how the company will investigate disclosures;
- how the company will make sure employees mentioned in disclosures, or related to disclosures, will be fairly treated; and
- how the policy will be made available to officers and employees.

Contacts

For questions about this policy, contact the board via email at info@eaf.org.au.

Version Control

Version	Board Approval	Description
1.0	28 January 2020	Initial policy to comply with the whistleblower requirements of the Corporations Act 2001 which came into effect on 1 January 2020