



WHISTLEBLOWER POLICY



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1. Purpose

- 1.1. The Alliance for a Green Revolution in Africa (AGRA) and its governing body, the Board of Directors (BOD), are committed to promoting and maintaining good corporate governance. This policy is intended to facilitate the smooth functioning of the organization in an open, transparent and fair manner by providing protection to individuals who report misconduct, by encouraging them to raise concerns rather than overlook them due to fear of retaliation. This will enable the organization to investigate misconduct that might otherwise go unaddressed, and take appropriate steps to deal with it.

2. Definition

- 2.1. For the purposes of this policy, whistle-blowing is defined as the deliberate, voluntary disclosure of any suspected or anticipated misconduct within or associated with the organization that is within its ability to control. A whistleblower is any staff member, vendor, consultant, contractor, grantee or other third party that makes such a disclosure.

3. Scope

- 3.1. This policy applies to any individual associated with the organization, regardless of their position, type of association, or location. Any individual who has observed misconduct has an obligation to report it through relevant communication channels.
- 3.2. This policy supplements AGRA's Ethics Policy and grievance procedures described in the Human Resources (HR) Policies Manual and Safeguarding of Vulnerable Persons Policy.
- 3.3. Regardless of their level, type of employment or location, AGRA employees must be encouraged to report concerns or complaints regarding conduct by AGRA Board members, managers, staff, vendors, contractors, consultants or grantees which they believe:
 - Is a breach of, or fails to implement, or does not comply with, the organization's governing rules, procedures, policies, or established standards of practice *e.g. accounting; procurement; grants making; human resources*; or
 - Is illegal or unlawful conduct (*e.g. fraud, corruption*); or
 - Is a breach of our Safeguarding of Vulnerable Persons Policy and Sexual Harassment Policy; or
 - Is unethical or inconsistent with the standards the organization subscribes to under our Ethics Policy; or
 - Is, or will result, in a waste of AGRA resources or pose a risk to the organization's reputation and integrity; or
 - Are dangerous practices likely to cause physical harm or damage to a person or to property; or
 - Is abuse of power or authority for any unauthorized or ulterior purpose; or
 - Represents a conflict of interest; or
 - Is an attempt to cover up any of the above types of actions.

- 3.4 Similarly, AGRA encourages its Vendors, Contractors, Consultants, Grantees and other third parties to report concerns or complaints they believe attain any of the examples outlined in section 3.3 above.
- 3.5 Where the matters being reported relate to: (a) employee grievances over decisions regarding the employee salary and benefits, employment status or other human resource issues affecting them; (b) discrimination, harassment and other offensive or disruptive behavior in the workplace; and (c) inter-personal difficulties between staff and their supervisors, or between staff members; these will be reviewed in accordance with the specific procedures established in the HR manual.
- 3.6 Matters that are reported relating to safeguarding of vulnerable persons including children shall be reviewed and investigated in accordance with the procedures established under AGRA's Safeguarding of Vulnerable Persons Policy.
- 3.7 Matters that are reported relating to sexual harassment shall be reviewed and investigated in accordance with the procedures established in the Sexual Harassment Policy.
- 3.8 Matters that are reported related to fraud shall be reviewed and investigated in accordance with the Anti-fraud Policy.
- 3.9 Matters that are reported related to money laundering shall be reviewed and investigated in accordance with the Anti-money Laundering Policy.

4. Communication channels

- 4.1. The following communication channels are available to individuals for reporting their concerns:
 - a. The Whistleblower email box (transparency@agra.org)
 - b. Whistleblower hotline
 - c. Immediate supervisor
 - d. Vice President, Unit Head , Regional Head or Country Manager
 - e. The Human Resources and Administration Director
 - f. Any other member of the Management Committee
 - g. The President
 - h. The Chair of the Audit Committee
 - i. The Head of the Internal Audit Unit (IAU)
- 4.2. Employees are encouraged to convey their concerns in writing to their immediate supervisor in the first instance. If they are not comfortable doing so or if the concern relates to their supervisor, or if the supervisor has not acted on similar earlier complaints, employees may convey their concerns to their Vice President/Unit Head, Regional Head or Country Head.
- 4.3. In those instances where they are not comfortable doing so or if the concern relates to their Vice President/Unit Head, Regional Head or Country Manager, employees may make written reports to the Human Resources and Administration Director, another member of the Management Committee, or the President, who may, in consultation with the whistleblower, decide to appoint an appropriate staff member or committee to investigate the matter reported.
- 4.4. Vendors, Contractors, Consultants, Grantees and other third parties are encouraged to submit their concerns to the Whistleblower email address.

- 4.5. An individual may make a written submission to the Head IAU, if he/she:
 - a. has grounds to believe that he/she will be subjected to retaliation by the persons he/she should report to under the established internal mechanism; or
 - b. considers it likely that evidence relating to the misconduct will be concealed or destroyed if it is reported under the internal mechanism; or
 - c. has previously reported the same information through the established internal mechanism and believes the organization failed to take appropriate action within a reasonable period of time.
- 4.6. All whistleblower accounts received through the channels outlined in 4.2 should be submitted to the Head of Internal Audit for review. The Head of the IAU shall report to the AC regarding any whistleblower report submitted to him/her.
- 4.7. Access to the whistleblower email account will be restricted to the Head of Internal Audit and the Chair of the Audit Committee
- 4.8. Based on the outcome of any investigation, the Chairperson of AC will request the President to decide on what action is appropriate. If, for example, disciplinary action against the offender(s) involved is warranted, The President will ensure that the necessary steps to implement his/her decision are taken.
- 4.9. If the case involves alleged wrongdoing by the President, the Head of IAU will refer it to the Chair of the Audit Committee who, in consultation with the Chairman of the Board, will determine whether an investigation should be conducted. The result of any such investigation shall be submitted to the Chairman of the Board who, in consultation with members of the Board, will decide what action to take.
- 4.10. It is strongly recommended that individuals identify themselves when reporting their concerns because this facilitates the investigation of the matter being raised. They may, however, choose to remain anonymous. Anonymous reports, however, will require careful scrutiny as to whether or not they merit further action or escalation based on the evidence presented by the report and the seriousness of any allegation.

5. Feedback to the whistleblower

- 5.1. AGRA recognizes the right of the whistleblower to receive confirmation that the matter has been properly addressed. Therefore, he/she will be given as much feedback as is appropriate under the circumstances, and subject to legal constraints, will be informed of the final outcome of the process.

6. Protection against retaliation

- 6.1. In making their reports in good faith, individuals are discharging their duty to protect and serve the Organization. AGRA will therefore respect, protect and keep confidential the identity of individuals who make such reports, and must ensure that there is no retaliation against them. Breaches in this regard will be treated as serious violations and will be subject to disciplinary provisions.
- 6.2. If a situation arises where the matter cannot be resolved without revealing the whistleblower's identity, the Organization will first discuss with him/her whether, and how best, to proceed.

7. Actions not protected under the policy

- 7.1. Where a whistleblower makes a report under this policy in good faith, reasonably believed to be true, there will be no action taken against him/her should the disclosure turn out to be inaccurate. Good faith shall be deemed lacking when the whistleblower does not have personal knowledge of a factual basis for the report or where he/she knew or reasonably should have known that the report is malicious, false, or frivolous. The organization will regard the making of any deliberately false or malicious allegations as misconduct, which may result in disciplinary action.
- 7.2. If a whistleblower has any personal interest in the matter he/she must make this clear at the time the alleged misconduct is reported. The act of whistle-blowing will not shield whistleblowers from the reasonable consequences flowing from any involvement in misconduct. An individual's liability for his/her own conduct is not affected by his/her disclosure of that conduct. However, in some circumstances, an admission may be a mitigating factor when considering disciplinary or other action.

8. Implementation of this policy

- 8.1. The President will ensure that the policy is adequately communicated and appropriate procedures put in place to ensure proper implementation of this policy.
- 8.2. The Head of Internal Audit will communicate other appropriate procedures aimed at ensuring proper implementation of this policy.