



# WHISTLE BLOWER POLICY

## Introduction

Reach for Change is committed to the highest possible standards of openness, honesty and accountability. In line with that commitment, we expect employees and others that we deal with who have serious concerns about any aspect of the company's work to come forward and voice those concerns.

## 1. What is whistle blowing?

Employees are usually the first to know when something is going seriously wrong. A culture of turning a "blind eye" to such problems means that the alarm is not sounded and those in charge do not get the chance to take action before real damage is done. Whistle blowing can therefore be described as attracting management's attention to information about potentially illegal and/or underhand practices, i.e. wrongdoing.

## 2. What is wrongdoing?

Wrongdoing involves any unlawful or illegal behavior and may include the following:

- An unlawful act, whether civil or criminal
- Breach of the Playing for Change Code of Conduct
- Breach of or failure to implement or comply with any Playing for Change policy
- Unprofessional conduct not complying with established standards of practice
- Questionable accounting or auditing practices
- Practices likely to cause physical harm or damage to a person or to property
- Abuse of power or authority for any unauthorized or ulterior purpose
- Unfair discrimination in the course of the employment or provision of services
- Conflicts of interest

## 3. Who is protected?

Any individual making a disclosure or raises a concern under this Policy will be protected if the individual:

- Discloses the information in good faith
- Believes it to be substantially true
- Does not act maliciously nor makes false allegations
- Does not seek any personal or financial gain

## 4. Who should you contact?

In order to report via Whistle bower, use the one of the following alternatives:

- To any manager that the person filing the report finds appropriate
- To Reach for Change's HR Director, Maria Modigh ([maria.modigh@reachforchange.org](mailto:maria.modigh@reachforchange.org))
- E-Mail Reach for Change's Chairman, Rachel Samrèn at [Rachel.Samren@millicom.com](mailto:Rachel.Samren@millicom.com).

Anonymous reports will be accepted, but contact details to the reporting person are appreciated.

## 5. How Reach for Change will respond

Reach for Change will be responsive and act upon any concerns rose under the Policy. Please note that Reach for Change will be able to assess the merits of your concern only after having conducted an initial inquiry and, if necessary, after duly investigating the matter in question.

Where appropriate, the matters raised may:

- be investigated by management, the Board of Directors, internal audit, or through the disciplinary process
- be referred to the Police or other law enforcement authorities



- be referred to the independent auditor In order to protect the individuals involved and those suspected of the alleged wrongdoing, an initial enquiry will be made to decide whether an investigation is appropriate and, if so, what form it should take. If urgent action is required; this will be taken before any investigation is conducted. The-overriding principle, which the Company will have in mind, is the interest of the Foundation and its founder.

## **6. False and Malicious Allegations**

Reach for Change is proud of its reputation and is striving to continue to meet the highest standards of honesty. It will therefore ensure that sufficient resources are put into investigating any complaint, which it receives. However, it is important for anyone contemplating making allegations to ensure that they are sincere and substantiated. No allegations should be made maliciously or with the knowledge that they are false. Reach for Change will regard the making of any deliberately false or malicious allegations by any employee of the Company as a serious disciplinary offence, which may result in disciplinary action, up to, and including dismissal for cause.

## **7. Recommended structure of a Whistle Blower Report**

- What has happened? Where has this happened? Please be as detailed as possible. When has this happened?
- Who was involved?
- Is this expected to happen again and if so, when and where?
- Which other persons may have knowledge of the above mentioned or may have access to relevant information?
- Is there any documentation or evidence available that may serve as evidence? If so, please include this information.
- Is there any other information that may be relevant or useful for the investigation or otherwise?