Whistleblower Policy

1. **PURPOSE**

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. Acting in accordance with this Policy ensures that serious concerns are duly reported and that Reach for Change responds in an appropriate manner.

2. **WHAT IS WHISTLEBLOWING?**

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

3. **WHAT IS WRONGDOING?**

Wrongdoing involves any unlawful or illegal behavior including, but not limited to, the following:

- An unlawful act, whether civil or criminal
- Breach of the Reach for Change Code of Conduct
- Breach of or failure to implement or comply with any Reach 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
4. PROTECTION OF WHISTLEBLOWER

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

5. WHO SHOULD YOU CONTACT?

In order to report a serious concern, use one of the following alternatives:

- To any Director or ‘Head of’ that the person filing the report finds appropriate. Email addresses are formulated firstname.lastname@reachforchange.org and all Directors and ‘Head of’ employees can be found at www.reachforchange.org
- To Reach for Change’s Director of Finance and Operations, Kajsa Korsgren (kajsa.korsgren@reachforchange.org)
- To Reach for Change’s Chairman, Torun Litzèn (torun.litzen@kinnevik.com)

Anonymous reports will be accepted and investigated. However, contact details to the reporting person are appreciated to increase the possibility of further investigation if needed. Any contact details provided will be duly protected in agreement with above.

6. REACH FOR CHANGE’S RESPONSE

Reach for Change will be responsive and act upon any concerns raised 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.

In order to protect the individuals involved, an initial enquiry will always 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 Reach for Change will have in mind, is the interests of the Foundation’s final consumers - the children. Reach for Change is committed to conducting business to the highest ethical standards and to going beyond the law to advance social responsibility.

Where appropriate, the concerns raised must:
- 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

7. RECOMMENDED STRUCTURE OF WHISTLEBLOWER 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?

8. FALSE AND MALICIOUS ALLEGATIONS

Reach for Change is continuously striving to meet the highest standards of honesty. It will therefore ensure that sufficient resources are put into investigating any complaint received. 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 Foundation as a serious disciplinary offence, which may result in disciplinary action, up to, and including dismissal for cause.

This policy was adopted by the Reach for Change Board at the Board meeting on December 2nd 2020. This policy is to be applied until further notice. It’s the CEO’s responsibility to invite the Board to initiate changes to it whenever needed.