

WHISTLEBLOWING SYSTEM

Purpose

The Africa Women's Development Fund (AWDF) acting through its Board of Directors is committed to ensuring that financial and material resources mobilised in the name of African Women are put to the service of Africa Women and not diverted to serve personal or material interests. To this end, we have put in place systems and structures to prevent, detect and investigate fraud, corruption, misconduct and malpractice.

This statement encourages staff and other partners to raise concerns about possible fraudulent or corrupt bahaviour rather than overlook them for fear of retaliation. Whistleblowing, will enable the organisations to promptly investigate allegations and take appropriate corrective action to address incidents that might otherwise be undetected. No person who acts in good faith and whistleblows shall suffer harassment, retaliation or any adverse consequences.

Employees can report suspected fraud, corruption or misconduct;

- directly to their supervisors
- > to the CEO
- > To the Chair of the board

Alternately, to facilitate reporting of suspected violations, where the reporter wishes to remain anonymous, a written statement may be submitted to:

Physical address: AWDF House, Justice Sarkodie Addo Avenue East Legon, Accra, Ghana.

Consultants, grantee partners and any other external person who wishes to report any suspected cases of fraud, corruption or malpractice or any inappropriate activity directly, anonymously, confidentially or otherwise should report through the following channels;

Email: integrity@awdf.org

Telephone: +233 242700881

Postal Address: PMB CT89, Cantonments, Accra, Ghana

Physical address: AWDF House, Justice Sarkodie Addo Avenue East Legon Accra Ghana

Who is a Whistleblower?

A person who is either an employee, consultant, volunteer or any person who informs a supervisor or the chief executive or a Board member about an activity relating to AWDF which that person believes to be fraudulent or contrary to AWDF's values, principles or mission.

What is Whistleblowing?

Whistleblowing refers to the process of disclosing suspected incidents of fraud, corruption, malpractice or misconduct, (whether financial or ethical), as well as illegal acts or omissions by AWDF staff or AWDF's external partners, including grantees, consultants or service providers.

What is fraudulent or dishonest conduct?

A deliberate act or failure to act with the intention of obtaining an unauthorized benefit. Examples of such conduct include;

- Repeated ill treatment of a staff member/organisational partner despite a complaint being made
- A criminal offence has been committed, is being committed or is likely to be committed
- Suspected fraud
- Disregard for legislation, particularly in relation to health and safety at work
- Breach of the organisation's financial administration policies
- Showing undue favour over a contractual matter or to a job applicant
- A breach of the organisation's code of conduct
- Forgery or alteration of documents
- Unauthorised alteration or manipulation of computer files to conceal information
- Fraudulent financial reporting
- Pursuit of a benefit or advantage in violation of AWDF's Conflict-of-Interest Policy
- Misappropriation or misuse of AWDF's resources, such as funds, supplies, or other assets
- Authorising or receiving compensation for goods not received or services not performed
- Authorising or receiving compensation for hours not worked
- Using remarks or actions of a sexual nature that are not welcome and are likely to be viewed as personally offensive, including sexual flirtations; unwelcome physical or verbal advances; sexual propositions; verbal abuse of a sexual nature; the display of sexually suggestive objects, cartoons, or pictures; and physical contact of a sexual or particularly personal nature.
- Using slurs, negative stereotyping, and threatening, intimidating, or hostile acts that relate to race, colour, religion, gender, gender identity, sexual orientation, national origin, age, or disability

Circulating or posting written or graphic material in the workplace that denigrates or shows
hostility or aversion toward an individual or group because of race, colour, religion, gender,
nationality, age, or disability

• Discriminating against an employee or potential employee due to a person's race, colour, religion, sex, sexual orientation, national origin, age, physical or mental impairment

• Facilitating or concealing any of the above or similar actions

Who can Whistleblow?

Staff, board members, consultants, volunteers, grantees and the general public are encouraged to report suspected fraudulent or dishonest conduct (i.e., to act as "whistleblower", pursuant to the procedures set forth below.

How do I Whistleblow?

You can Whistleblow in writing or orally, by telephone, email, letter or in person.

To whom Should I Whistleblow?

A person's concerns about possible fraudulent or dishonest use or misuse of resources or property should be reported through the following channels. Alternately, to facilitate reporting of suspected violations where the reporter wishes to remain anonymous, a written statement may be submitted to one of the following reporting channels.

Email: integrity@awdf.org

Telephone: +233242700881

Postal Address: PMB CT 89, Cantonments Accra, Ghana

Physical address: AWDF House, Justice Sarkodie Addo Avenue, East Legon Accra, Ghana

Internally, staff members should report suspected cases of fraud to their supervisor or, if suspected by a volunteer, to the staff member supporting the volunteer's work. If, for any reason, a person finds it difficult to report her or his concerns to a supervisor or staff member supporting the volunteer's work, the person may report the concerns directly to the Chief Executive Officer.

Do I Have a right to Whistleblow?

As an employee, you have the right to report suspected fraudulent or dishonest behaviour in the organisation.

Supervisors are required to report suspected fraudulent or dishonest conduct to the Chief Executive Officer, except in cases involving the CEO, in which case the report should go to the board. Reasonable care should be taken in dealing with suspected misconduct to avoid;

- Baseless allegations
- Premature notice to persons suspected of misconduct and/or disclosure of suspected misconduct to others not involved with the investigation
- Violations of a person's rights under law

Due to the important yet sensitive nature of the suspected violations, effective professional follow-up is critical. Supervisors, while appropriately concerned about "getting to the bottom" of such issues, should not in any circumstances perform any investigative or other follow-up steps on their own. Accordingly, a supervisor who becomes aware of suspected misconduct

- Should not contact the person suspected to further investigate the matter or demand restitution
- Should not discuss the case with attorneys, the media, or anyone other than the chief executive
- Should not report the case to an authorised law enforcement officer without first discussing the case with the Chief Executive Officer or the board.

What should the report include?

Employees and others may communicate suspected cases of fraud, corruption or malpractice or other wrongdoing or alleged retaliation by contacting AWDF. If you wish to remain anonymous, it is not necessary that you give your name or position in any notification.

Whether or not you identify yourself, for a proper investigation to be conducted, please provide AWDF with as much information as you can, sufficient to do a proper investigation, including where and when the incident occurred, names and titles of the individuals involved, and as much other detail as you can provide.

What principles apply when dealing with such cases?

- All reports are to be taken seriously
- All reports are dealt with immediately
- The Whistleblower may choose to remain anonymous

- Anonymous sources can be as valuable as open sources
- The various methods of whistleblowing are to be given equal weight
- Reports are to be dealt with confidentially
- The whistle blower should be given feedback within reasonable time unless he or she choose to remain anonymous

Will I get feedback?

The compliance officer will notify the sender and acknowledge receipt of the reported violation or suspected violation within 5 business days.

Who Deals with the report and what is the procedure?

All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

Will I put myself at risk?

No director, officer, or employee who in good faith reports a violation of the Code, financial or illegal malpractices shall suffer harassment, retaliation, or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower statement is intended to encourage and enable employees and others to raise serious concerns within the organization prior to seeking resolution outside the organization.

How about the person who has been reported?

All persons' who have been reported will be made aware of the allegations against them and given the opportunity to also present their version of the issue at stake. After the investigations are concluded the person who has been reported will be informed immediately regardless of the outcome.

Dated Nov 2019