

WHISTLEBLOWING POLICY

Version	4
Policy Owner:	General Counsel
Date of First Approval by AFC:	3 April 2018
Review Schedule:	Approved annually by the Board
Date of Most Recent Review:	March 2023
Date of Next Review:	March 2024

Introduction

- 1.1 We are committed to carrying out our mission with honesty and integrity, and we expect all Employees to maintain high standards. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring and to address them when they do occur.
- 1.2 The aims of this policy are:
 - to encourage Employees to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected;
 - to provide Employees with guidance as to how to raise those concerns; and
 - to reassure Employees that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.
- 1.3 Any questions about this policy should be directed to the Legal Team.

2 Scope of Policy

- 2.1 This policy applies to Global Innovation Fund (UK) and its subsidiaries and affiliates (collectively referred to as **GIF**) and every employee (which for these purposes includes temporary and contract staff, consultants, agents, volunteers, and secondees) of GIF (**Employees**).
- 2.2 While statutory whistleblowing law may not apply to Employees who do not have a contract of employment with GIF (for example, contract staff employed through an agency, consultants and secondees), we encourage such Employees to feel comfortable following this policy and we are committed to acting fairly in respect of all Employees who raise a genuine whistleblowing concern.
- 2.3 This policy does not form part of any employee's contract of employment and we may amend it at any time.

3 Compliance and Review

- 3.1 The **Whistleblowing Officer** will be the General Counsel, deputised by the Senior Legal Counsel and Company Secretary. The Whistleblowing Officer has day-to-day operational responsibility for this policy and must ensure that all managers and other Employees who may deal with concerns or investigations under this policy receive regular and appropriate training. Compliance with this policy is monitored periodically by the Whistleblowing Officer.
- 3.2 The General Counsel will review, and the Board will approve, this policy annually.
- 3.3 All Employees are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing.

4 What Is Whistleblowing?

4.1 **Whistleblowing** is the disclosure by an Employee of information that relates to suspected wrongdoing or dangers at work. This may include (and is not limited to):

- criminal activity;
- failure to comply with any legal or professional obligation or regulatory requirements;
- miscarriages of justice;
- danger to health and safety;
- damage to the environment;
- bribery;
- financial fraud or mismanagement;
- conduct likely to damage our reputation or financial wellbeing;
- unauthorised disclosure of confidential information;
- negligence;
- the deliberate concealment of any of the above matters.

4.2 A **whistleblower** is an Employee who raises a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a **whistleblowing concern**) you should report it under this policy.

4.3 This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases, you should use the Grievance Procedure or Anti-Harassment and Bullying Policy as appropriate.

4.4 Matters relating to any kind of safeguarding concern (including in relation to poor practice, abuse or neglect of a child, young person or adult at risk) must be reported in accordance with the GIF Safeguarding Policy by escalating the matter to the GIF Designated Safeguarding Officer (who is appointed under the Safeguarding Policy and is the same person as the Whistleblowing Officer).

4.5 If you are uncertain whether something is within the scope of this policy you should seek advice from the Whistleblowing Officer, whose contact details are at the end of this policy.

5 Raising A Whistleblowing Concern

5.1 In most cases, your first port of call should be to raise any concerns with your manager. You may tell them in person or put the matter in writing if you prefer. They may be able to

agree a way of resolving your concern quickly and effectively. In some cases, they may refer the matter to the Whistleblowing Officer.

5.2 However, where the matter is more serious, or you feel your manager has not addressed your concern, or you prefer not to raise it with them for any reason, you should contact one of the following:

- the Whistleblowing Officer (General Counsel);
- the CEO; or
- the Safeguarding Lead Trustee (as appointed under GIF's Safeguarding Policy),

either individually or via GIF's designated email address for whistleblowing and safeguarding concerns, concerns@globalinnovation.fund, to which the Whistleblowing Officer and Designated Safeguarding Officer and Deputy Designated Safeguarding Officer (as nominated under the Safeguarding Policy) have access.

5.3 We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

5.4 We will take down a written summary of your concern and provide you with a copy after the meeting. We will also aim to give you an indication of how we propose to deal with the matter.

6 Confidentiality

6.1 We hope that Employees will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

6.2 We do not encourage Employees to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible. Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to the Whistleblowing Officer or one of the other contact points listed in paragraph 5 and appropriate measures can then be taken to preserve confidentiality. If you are in any doubt, you can seek advice from Public Concern at Work, the independent whistleblowing charity, which offers a confidential helpline. Their contact details are at the end of this policy.

7 Investigation and Outcome

7.1 Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment. You may be required to attend additional meetings in order to provide further information.

- 7.2 In some cases, we may appoint an investigator or team of investigators, including staff, with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.
- 7.3 We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.
- 7.4 If we conclude that a whistleblower has made false allegations maliciously or with a view to personal gain, the whistleblower will be subject to disciplinary action.
- 7.5 The Whistleblowing Officer must inform the CEO and Safeguarding Lead Trustee of whistleblowing reports as appropriate, to enable prompt and appropriate reporting of any serious incidents to the Charity Commission and/or insurers.¹

8 If You Are Not Satisfied

- 8.1 While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy you can help us to achieve this.
- 8.2 If you are not happy with the way in which your concern has been handled, you can raise it with one of the other key contacts in paragraph 5.

9 External Disclosures

- 9.1 The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally. External disclosure is a serious step for a Whistleblower to take and the law is relatively prescriptive in this area as to the circumstances in which it is appropriate and to whom disclosure should be made. Therefore, we strongly encourage you to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Public Concern at Work, operates a confidential helpline. Their contact details are at the end of this policy.
- 9.2 In very serious cases and where no internal channel at GIF is appropriate, it may be appropriate to report your concern to the FCDO Counter Fraud and Whistleblowing Unit. Their contact details are at the end of this policy.
- 9.3 The law recognises that in some circumstances it may be appropriate for you to report your concerns to the relevant regulator (as prescribed by the UK Department for Business,

¹ The Charity Commission for England and Wales has prepared guidance on reporting serious incidents, which is accessible here: <https://www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity>

Energy & Industrial Strategy). Public Concern at Work has a list of prescribed regulators for reporting certain types of concern.

- 9.4 Whistleblowing concerns usually relate to internal issues, but they may sometimes relate to the actions of a third party, such as an investee/grantee, supplier or service provider. In some circumstances, the law will protect you if you raise the matter with the third party directly. However, we strongly encourage you to report such concerns internally at GIF first. You should contact your manager or one of the other individuals set out in paragraph 5 for guidance.
- 9.5 It will very rarely, if ever, be appropriate to alert the media.

10 Protection and Support for Whistleblowers

- 10.1 It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken.
- 10.2 Whistleblowers must not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Whistleblowing Officer immediately. If the matter is not remedied, you should raise it formally using our Grievance Procedure.
- 10.3 You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct you may be subject to disciplinary action.

11 Contacts

GIF's Whistleblowing Email Address (only accessed by the Whistleblowing Officer/Designated Safeguarding Officer, Deputy Designated Safeguarding Officer and the Safeguarding Lead Trustee)	concerns@globalinnovation.fund
FCDO Counter Fraud and Whistleblowing Unit (CFWU)	Phone: +44 (0) 1355 843747 E-mail: reportingconcerns@fcdo.gov.uk
Public Concern at Work (independent whistleblowing charity)	Helpline: +44 (0) 2074 046609 E-mail: whistle@pcaw.co.uk Website: www.pcaw.co.uk