

**General information**

<b>Title</b>	CcHUB Whistleblowing Policy
<b>Approval Date</b>	27/06/2024
<b>Effective date</b>	28/06/2024
<b>Review date</b>	28/06/2026
<b>Applicability and exceptions</b>	All Staff, Consultants, and Volunteers engaged by CcHUB and its subsidiaries
<b>Other related policies</b>	CcHUB Code of Conduct, CcHUB Harassment and Discrimination Policy, CcHUB Children and Young People safeguarding policy, and other policies related to this that may come into force after this policy is approved

**1. Introduction**

Whistleblowing is the act of reporting any information or activity in an organisation that is deemed fraudulent, illegal, or unethical. It is an important aspect of fraud risk management. The development of a policy to guide whistleblowing is in line with the commitment of the management of CcHUB (the “Company”) to encourage the adoption of leading practices in fraud risk management.

**2. Purpose**

We are committed to conducting our work in accordance with CcHUB Values and Behaviours and upholding the standards of the CcHUB Code of Conduct. However, as CcHUB, we realise that all companies face the risk of things going wrong or unknowingly harbouring illegal or unethical conduct. A culture of transparency and accountability is essential to prevent such situations from occurring and to address them when they do occur.

The aims of this policy are:

1. To provide an effective mechanism for reporting and investigating suspected cases of fraudulent and illegal activities within CcHUB and its entities.

2. To encourage and enable all stakeholders to report suspected cases of fraudulent and illegal activities within CcHUB and its entities as soon as possible, with the assurance that their concerns will be taken seriously and investigated where appropriate and that their confidentiality and, if desired, anonymity will be respected.
3. To reassure stakeholders that they should be able to raise genuine concerns regarding the conduct described below without fear of retaliation or reprisals, even if they turn out to be mistaken if they are done in good faith.
4. To reinforce the Company's non-victimisation policy for any stakeholder that reports concerns in good faith.

### **3. Application and scope**

- 3.1. This Whistleblowing Policy applies to all CcHUB and its entities' Staff, Consultants and Volunteers.
- 3.2. This Whistle-Blowing Policy applies to reporting and investigating fraudulent, unethical, and illegal activities and to safeguards available to whistleblowers.
- 3.3. Nothing contained herein is intended to provide any Whistleblower with any additional rights or causes of action other than those provided by law. We further reserve the right to amend this policy at any time.
- 3.4. This Whistleblowing Policy is not designed for Staff and Volunteers to:
  - 3.4.1. Make a general complaint that does not fall under the definition of Whistleblowing.
  - 3.4.2. Raise issues of policy or strategy where there is no breach of applicable CcHUB policies or local laws.
  - 3.4.3. It does not apply to or change the Company's policies and procedures for individual employee grievances and complaints relating to job performance as well as terms and conditions of employment. These would be handled through the People team in line with the provisions of the Human Resources Policies as well as other applicable policies and procedures.
  - 3.4.4. This Whistleblowing Policy should be read in conjunction with local legislation (where possible).

- 3.4.5. This policy supersedes all prior policies, guidelines, and practices that pertain to whistleblowing.

#### 4. Definitions

For the purpose of this policy, the following definitions shall apply:

- 4.1. **Ethics committee:** Means the committee formed to administer the policy, evaluate, consider and investigate the protected disclosures received from a whistleblower under this policy.
- 4.2. **Good faith:** The act of a whistleblower sending his/her report without malice or consideration of personal benefit and believes the report to be true to the best of his/her knowledge.
- 4.3. **Manager:** Refers to a staff member who has the responsibility of line managing or supervising the work of Staff, Consultants or Volunteers.
- 4.4. **Policy Administrators:** Refers to but not limited to the following individuals:
  - 4.4.1. Chair of CcHUB Board
  - 4.4.2. Managing Directors
  - 4.4.3. Managing Partners
  - 4.4.4. Head of Operations
  - 4.4.5. Director People
  - 4.4.6. Safeguarding Lead
  - 4.4.7. Compliance Manager
  - 4.4.8. External Whistleblowing service providers
  - 4.4.9. Any other individual who may be co-opted based on their expertise.

Each of these individuals shall administer the Policy and be core members of the Ethic Committee so far as it relates to a Whistleblowing Concern that falls within their functional remit as outlined in the policy.

- 4.5. **Volunteer:** Refers to a range of non-paid individuals who have committed to work with or support CcHUB, or who are otherwise affiliated with CcHUB such that they could objectively be seen as a representative of the organisation. It includes, among others, board members, volunteers (including community volunteers), and interns.
- 4.6. **Whistleblowing:** Is the disclosure of information that relates to events of misconduct, illegal, or unethical activities relating to or affecting the Company by CcHUB or its Entity

Staff or Volunteers or CcHUB partner or contractor which is related to their work. This may include (but is not limited to) the following unethical and/or illegal conduct or activity, irregularities, wrongdoing, or dangers:

- 4.6.1. Deliberate disregard or breach of CcHUB internal policies and procedures, including (but not limited to) the following:
  - 4.6.1.1. CcHUB Code of Conduct.
  - 4.6.1.2. Safeguarding Policy for Children and Young People.
  - 4.6.1.3. CcHUB Harassment and Discrimination Policy.
- 4.6.2. Criminal offenses or breaches of civil law or regulations.
- 4.6.3. Endangerment of the health or safety of any person; or
- 4.6.4. Conflict of interest and abuse of office.
- 4.6.5. Unethical practices.
- 4.6.6. Misuse of physical and information assets.
- 4.6.7. Sexual harassment.
- 4.6.8. Activities that constitute a danger to property.
- 4.6.9. All forms of bribery and corruption.
- 4.6.10. Suppressed past criminal records.
- 4.6.11. The deliberate concealment of any of the above.
- 4.7. **Whistleblower:** A member of staff or volunteer who makes a protected disclosure about illegal or fraudulent activities or improper conduct relating to any of the above that is reasonably believed to be genuine.
- 4.8. **Safeguards:** Arrangements made by the Company to protect a whistleblower.
- 4.9. **Staff:** Refers to paid individuals whose relationship with CcHUB is governed by an employment contract or applicable employment terms.

## **5. Roles and responsibilities**

- 5.1. **All Staff and Volunteers shall be responsible for:**
  - 5.1.1. Reporting any whistleblowing concerns they may have in accordance with the reporting procedure described below, as CcHUB may amend at its discretion. Assist in any investigations of whistleblowing concerns by making available all relevant information and cooperating in interviews.
- 5.2. **Managing Partners, Unit and Practice leads are responsible for**

- 5.2.1. Ensuring that the principles of this policy are communicated and understood throughout their teams.
- 5.2.2. Escalating any reports of whistleblowing concerns they may receive to the appropriate Policy Administrator.
- 5.3. **The Policy Administrators (Ethics Committee)** shall be responsible for:
  - 5.3.1. Providing training, advice, guidance, and ongoing support to practice leads and managers on the implementation and use of the Whistleblowing Policy.
  - 5.3.2. Determining the scope, if any, of the investigation of Whistleblowing Concerns raised pursuant to this policy, determining who should undertake the investigation, and ensuring that any subsequent investigation is promptly and properly managed.
  - 5.3.3. Facilitating the implementation by management of appropriate responses to recommendations made in Whistleblowing investigation reports.
  - 5.3.4. Providing CcHUB Board with an annual summary report of reported Whistleblowing Concerns.
  - 5.3.5. The retention of all records of reported Whistleblowing Concerns and Whistleblowing investigations on a strictly confidential basis for the required periods under the CcHUB Retention, Storage, and Destruction of Key Documents Policy.
- 5.4. **The Managing Director** is responsible for ensuring the implementation and monitoring of the Whistleblowing Policy.
- 5.5. **The CcHUB Board** is responsible for overseeing management's implementation and monitoring of the Whistleblowing Policy.

## **6. Obligations of the WhistleBlower**

The whistle-blower shall take note of the following obligations:

- 6.1. All whistleblowing reports should be made in good faith;
- 6.2. The whistleblower should have reasonable ground to believe that the whistle-blowing report is true; and

- 6.3. The whistleblower should ensure that the report is not made with the intention of making some personal gains.

## 7. Allegations in Bad Faith

Allegations that are confirmed to be made in bad faith shall result in disciplinary actions.

## 8. Safeguards

- 8.1. **Harassment or victimisation**—The Company will not tolerate harassment or victimisation for reporting concerns under this policy and shall take all necessary steps to protect any stakeholder that reports a concern in good faith.
- 8.2. **Confidentiality**—The Company shall treat all reports and reporters with the highest regard for confidentiality.
- 8.3. **Anonymity**—whistleblowing reports can be treated anonymously. However, the company encourages whistleblowers to put their names to the reports so that appropriate follow-up questions and investigations would be handled properly.

## 9. Whistleblowing Process

### 9.1. Raising a Whistleblowing Concern

Employees, consultants, and volunteers are strongly encouraged to report any whistleblowing concerns they may have to their immediate line manager (if they are not the one violating the policy), a more senior manager up to and including a Practice Lead, a Managing Partner, the People Team, Heads of Units, or the Policy Administrators. Reports can be made in person, by telephone, or in writing. There are various channels open to Staff, fellows, and Interns within CcHUB and its entities for reporting Whistleblowing Concerns. These are summarised below.

#### 9.1.1. Staff, Consultants and Volunteers

CcHUB understands the complexity of whistleblowing. Thus, there will be different official reporting channels for staff that will be applicable based on the nature of the whistleblowing concern to be raised: They will be as follows:

- 9.1.1.1. Staff, associates and program participants can report concerns by emailing a dedicated whistleblowing inbox

[whistleblowing@cchub.africa](mailto:whistleblowing@cchub.africa) that is managed by policy administrators.

- 9.1.1.2. "If the report mentions one or more policy administrators as subjects, it will be directly submitted to the Managing Director and/or Director of People (provided that neither of them is mentioned as a subject) through a whistleblowing reporting link available on the CcHUB website."
- 9.1.1.3. For reports involving senior leadership the following processes and procedures will apply.
  - 9.1.1.3.1. Any report where a managing partner is mentioned as a subject the report will be done to the Managing director who will determine the composition of the Ethics Committee to manage the report.
  - 9.1.1.3.2. Any report where the managing director is the subject the report will be done to and managed by the Chair of the CcHUB Board. The chair may designate the report management as they deem appropriate.
- 9.1.1.4. To ensure confidentiality and anonymity on reporting concerns and build reporting confidence the company **will** engage an external whistleblowing vendor to set up an independent confidential misconduct reporting system as an alternative for Staff, Associates, and Program Participants who are unable or who would prefer not to report internally.

## 9.1.2. **Third Parties**

Third parties can report any suspected irregularities or wrongdoing by CcHUB or its entities by raising their concern with a staff member, consultant, or volunteer. Third parties may also use the external whistleblowing platform set up by a contracted whistleblowing together with CcHUB.

## 9.1.3. **External Disclosures**

This Policy aims to provide an internal mechanism for reporting, investigating, and remedying Whistleblowing Concerns. This does not, however, affect the right of Staff

and Volunteers to report Whistleblowing Concerns to an external body (such as a regulator) where the individual believes this is the appropriate course of action. Whistleblowers should seek advice from a Manager, the People Team, the Head of units, and/or the Policy Administrators as applicable before reporting Whistleblowing Concerns externally.

## **10. Confidentiality**

Whistleblowers should feel comfortable reporting whistleblowing concerns openly under this Policy. Reports of whistleblowing concerns will be treated with the utmost confidentiality by all parties involved or otherwise aware of what has been reported, subject to any disclosures required as part of any regulatory process or legal proceedings, about which the Whistleblower will be advised where possible prior to disclosure where possible.

Although not prevented from doing so, Whistleblowers are encouraged not to make anonymous disclosures since proper investigation may be prevented if investigators cannot clarify or obtain further information from the Whistleblower. The inability to obtain follow-up information from a Whistleblower may lead to the closure of the process. Whistleblowers who are concerned about possible retaliation or reprisals if their identity is revealed should make this clear when making the report so that appropriate measures can be taken to protect their identity as far as possible.

## **11. Managing Whistleblowing Concerns**

Whistleblowing concerns will be managed by a team of policy Administrators (known as the ethics committee) who shall consist of the following persons, each of whom shall be a full-time employee of CcHUB and any other expert that CcHUB will deem appropriate to serve in the team as a co-opted member of the team.

1. The Head of Operations shall manage reports of whistleblowing concerns relating to fraud, corruption, bribery, or other financial impropriety and
2. The CcHUB Director of People shall manage reports of whistleblowing concerns relating to workplace misconduct between staff, consultants and volunteers, including harassment, bullying, or discrimination other than sexual harassment, exploitation, or abuse.
3. The CcHUB Safeguarding of Children and Young People lead shall manage reports of Whistleblowing Concerns related to a child or youth safeguarding issue (pursuant to the reporting procedures detailed in the Policy on Safeguarding Children and Young People and



reporting and responding to safeguarding issues and incidents are outlined in the CcHUB safeguarding policy and its implementation standards and procedures.

#### **11.1. The policy administrators (Ethics Committee)**

##### **11.1.1. Role of the Ethics Committee**

1. The Ethics Committee shall be the body duly authorised by the Board to consider and evaluate all protected disclosures from whistleblowers, maintaining records thereof and liaising with the Managing Director in the preparation of the reports to the Board as per the policy.
2. The Ethics Committee shall meet and determine within fifteen (15) days of receipt of a report, whether that report is admissible in line with the whistleblowing policy.
3. The Ethics Committee may co-opt or liaise with professional investigators inside or outside the organisation in the event that it requires investigation and or guidance with regard to any matter under its consideration.

##### **11.1.2. Composition of Ethics Committee**

11.1.2.1. The Ethics Committee shall consist of the following persons, each of whom shall be a full-time employee of CcHUB and is well respected for integrity, independence, and fairness:

1. The Managing Director - Serves as the chair of the committee
2. All managing Partners - Will serve as CcHUB Leadership representative
3. Director People - Will represent the human resource perspective
4. The Head of Operations
5. Chief Finance Officer
6. Compliance manager
7. Safeguarding Lead - Will bring expertise related to any whistleblow related to safeguarding.

8. Any other person as the committee may consider necessary to discharge its functions under this policy;
- 11.1.2.2. The CcHUB Managing Director (or designated Managing Partner) will serve as the Ethics Committee chairperson whose primary function shall be to preside during the conduct of the committee's functions.
- 11.1.2.3. The nature of the incident that will be reported will determine if the full committee will manage the reported incident or if only a section of the committee will be involved.
- 11.1.2.4. A member of the Ethics Committee, who is the subject of a whistleblower's report, shall not attend or participate in the proceedings of the committee until the report of breach against such member is conclusively resolved.
- 11.1.3. The Chair of the CcHUB Board of Directors shall manage reports of Whistleblowing Concerns related to any subject matter that involves the Chief Executive Officer or any member of the Board, with delegation to appropriate staff as necessary.
- 11.1.4. In cases where there are multiple allegations against different people in one Whistleblower Concern, the Policy Administrators will collaborate to determine the most effective way forward. The designated Policy Administrator shall always be completely independent of the allegations made. For example, any allegations relating to fraudulent behavior by the "Head of a unit/ practice lead" the incident shall be managed by someone outside of the Unit or Practice. In case of any doubt, the matter shall be referred to the senior leadership for determination.
- 11.1.5. **Initial Assessment**

As an initial step, the relevant Policy Administrator(s) shall decide by conducting an initial assessment whether the reported Whistleblowing Concern should be investigated. A decision not to investigate may be made at the discretion of the Policy Administrator, which may include cases where:

  1. Insufficient information is provided by the Whistleblower.

2. The allegations do not fall under the definition of Whistleblowing.
3. The same issues have been raised previously and found to be unsubstantiated.
4. The issue is referred to another body (such as management or the board of another CcHUB entity, which may decide to investigate itself).

#### 11.1.6. **Investigations**

Once a decision is made to investigate a reported whistleblowing concern, the Policy Administrator may delegate the responsibility to one or more appropriate staff members or any other individual. In cases involving the CEO or a Board member that the Policy Administrator has decided to investigate, an external investigator reporting to the appropriate Policy Administrator should generally be used.

Whistleblowers who are not anonymous may request to be accompanied at any meetings regarding the whistleblowing concern by a colleague of the whistleblower's selection or, if locally applicable, by an appropriate trade union or employee representative. The Whistleblower may be requested to select an alternative colleague if the one identified is deemed not a reasonable choice by the Policy Administrator.

Where appropriate and subject to the need for confidentiality, the Whistleblower should be kept informed of the progress of the investigation. In circumstances where the Whistleblower is anonymous, it is generally not appropriate to provide details beyond the fact that an investigation has started or has been completed.

If an initial assessment or an investigation concludes that a Whistleblower (a CcHUB or its entity staff) has maliciously or knowingly made false allegations, the Whistleblower may be subject to disciplinary action, up to and including termination of employment.

#### 11.1.7. **Protection and Support for Whistleblowers**

CcHUB is committed to protecting members of Staff and Volunteers who make disclosures under this Policy.

Any member of staff, consultant, or volunteers who retaliates against a whistleblower or in any way causes a Whistleblower to suffer adverse employment consequences because of their report is subject to discipline up to and including termination of employment. Retaliation and adverse employment consequences may include, for example, intimidation, bullying, harassment and discrimination, failure to promote, adverse impact on compensation or benefits, termination, suspension, demotion, or other change in responsibilities, whether formal or informal.

Staff, consultants, and volunteers who believe they have suffered retaliation or adverse employment consequences because of having reported a whistleblowing concern should inform the appropriate Policy Administrator and are encouraged to refer to the CcHUB Harassment and Discrimination Policy and other related CcHUB policies.

#### **Approved By**

**Name** Ojoma Ochai

**Title** Managing Director

**Signature**  11 July 2025