The principal objective of a whistle blowing policy and procedure is to:

- Convey the seriousness and importance that the employer attaches to identifying and remedying wrongdoing.

- Encourage employees, volunteers and others to raise concerns internally as soon as possible and to give them the confidence to do so.

- Remind employees, volunteers and others (often by cross-referring to other policies and codes of conduct) of the standards of behaviour expected of them.

- Ensure employees, volunteers and others know whom to approach with a concern, and to enable them to bypass the person, management level or part of the organisation to which the concern relates.

- Outline the procedures for investigating disclosures and what steps might be taken if wrongdoing is uncovered.

- Make it clear what will happen to those who victimise genuine whistleblowers or abuse the system by making malicious allegations.

- Provide access to further sources of advice and guidance on whistle blowing.
WHISTLE BLOWING POLICIES

CONTENTS

Clause

1. About this policy................................................................. 1
2. What is whistleblowing?......................................................... 1
3. How to raise a concern .......................................................... 1
4. Confidentiality........................................................................ 2
5. External disclosures............................................................... 2
6. Protection and support for whistleblowers.............................. 2
7. Contacts.................................................................................. 3
WHISTLE BLOWING POLICIES

1. About this policy

1.1 We are committed to conducting our business with honesty and integrity and we expect all staff to maintain high standards. Any suspected wrongdoing should be reported as soon as possible.

1.2 This policy covers all employees, officers, consultants, contractors, volunteers, interns, casual workers and agency workers.

1.3 This policy does not form part of any employee's contract of employment, however, we expect that its principles and procedures should be followed by all workers within its scope. We reserve the right to amend the content of this policy, as necessary, from time-to-time.

1.4 A disclosure under this policy can relate to any wrongdoing anywhere in the world; it is not restricted to matters purely arising just in the UK or US.

2. What is whistle blowing?

Whistle blowing is the reporting of suspected wrongdoing or dangers in relation to our activities. This includes bribery, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment and any breach of legal, ethical or professional obligations. It also includes the following non-exhaustive list of matters which may be specific to this workplace:

• Malpractice or ill treatment of a patient/client/customer by a member of staff
• Breach of standing financial instructions
• Showing undue favour over a contractual matter or to a job applicant
• Breach of any relevant code of conduct
• Attempts to conceal any of the above

3. How to raise a concern

3.1 We hope that in many cases you will be able to raise any concerns with your manager. However, where you prefer not to raise it with your manager for any reason, you should contact the Head of Human Resources or the Chief Executive Officer. Contact details are at the end of this policy.

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

4. Confidentiality

We hope that employees, volunteers and others will feel able to voice whistle blowing concerns openly under this policy. Completely anonymous disclosures are difficult to investigate. If you want to raise your concern confidentially, we will make every effort to keep your identity secret and only reveal it where necessary to those involved in investigating your concern.

5. External disclosures

5.1 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.

5.2 In some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. We strongly encourage you to seek advice before reporting a concern to anyone external.

6. Protection and support for whistleblowers

6.1 We aim to encourage openness and will support whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken.

6.2 Whistleblowers must not suffer any detrimental treatment as a result of raising a genuine concern. If you believe that you have suffered any such treatment, you should inform the Head of Human Resources or the Chief Executive Officer immediately.

6.3 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.

6.4 However, if we conclude that a whistleblower has made false allegations maliciously or with a view to personal gain, the whistleblower may be subject to disciplinary action.
7. Contacts

<table>
<thead>
<tr>
<th>Whistle blowing Officer - Head of Human Resources</th>
<th><a href="mailto:whistleblowing@ejaf.org">whistleblowing@ejaf.org</a></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>020 7603 9996</td>
</tr>
</tbody>
</table>