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Whistleblowing Policy

Submitted by:

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1. Introduction and Purpose

1.1. Our Commitment: Corelink Consulting Limited ("the Company") is fundamentally committed to the highest standards of integrity, transparency, and accountability. We believe in fostering an environment where employees and stakeholders can raise serious concerns without fear of retaliation. This policy provides a secure and confidential framework for reporting any suspicions or allegations of wrongdoing that affect the Company, its clients, employees, or the public interest.

1.2. Purpose of the Policy: The purpose of this policy is to:

- Encourage individuals to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated appropriately, and that their confidentiality will be respected.
- Provide clear guidance on how to raise a concern and how the Company will respond.
- Offer reassurance that individuals who report concerns in good faith will be protected from any form of reprisal, victimisation, or "Occupational Detriment."
- Deter and detect misconduct, thereby protecting the Company's assets, reputation, and the welfare of its staff and clients.

This policy is established in accordance with the principles of the **Public Interest Disclosure (Protection of Whistleblowers) Act, No. 4 of 2010** of the Laws of Zambia.

2. Scope of the Policy

2.1. Who is Covered: This policy applies to all individuals working for or with Corelink Consulting Limited at all levels, including:

- Full-time and part-time employees
- Temporary staff and agency workers
- Contractors and sub-contractors
- Consultants and secondees
- Volunteers and interns
- Directors and officers

2.2. What to Report (Reportable Conduct): This policy is intended to cover serious concerns about misconduct or malpractice. While this is not an exhaustive list, "Reportable Conduct" includes, but is not limited to, the following:

- **Criminal Offences:** Suspicions of any criminal activity.
- **Sexual Harassment, Abuse, or Exploitation:** Any unwelcome sexual advances, requests for sexual favours, or other verbal or physical conduct of a sexual nature.
- **Fraud, Theft, or Corruption:** Including bribery, embezzlement, false accounting, and misappropriation of company or client assets.
- **Aid Diversion:** The misuse, misappropriation, or diversion of funds, goods, or services intended for humanitarian or development aid projects.
- **Money Laundering:** The process of concealing the origins of illegally obtained money.
- **Financing of Terrorism:** Providing or collecting funds with the intention or knowledge that they are to be used to carry out terrorist acts.
- **Failure to Comply with Legal Obligations:** Breaches of statutory or regulatory requirements.
- **Dangers to Health and Safety:** Actions that create a significant risk to the health or safety of employees, clients, or the public.
- **Environmental Damage:** Actions causing or likely to cause damage to the environment.
- **Miscarriages of Justice:** Actions that obstruct or pervert the course of justice.
- **Unethical Conduct:** A serious breach of the Company's Code of Conduct.
- **Concealment of Information:** The deliberate concealment of information relating to any of the above matters.

This policy is distinct from the Company's grievance procedure, which should be used for personal complaints about an individual's employment situation.

3. Key Definitions

- **Whistleblower:** An individual who, in good faith, discloses information about Reportable Conduct.
- **Good Faith:** A report made with an honest belief that the information is true. A report is not made in "good faith" if the individual knows it to be false or makes it with malicious intent.
- **Occupational Detriment:** As defined in the Public Interest Disclosure Act, this includes being subjected to disciplinary action, dismissal, suspension, demotion, harassment, intimidation, transfer against one's will, or being otherwise adversely affected in respect of employment or career.

4. Confidentiality and Anonymity

4.1. Confidentiality: The Company is committed to protecting the identity of any individual raising a concern. All reports will be treated with the strictest confidence. The identity of the whistleblower will not be disclosed without their prior consent, unless required by law (e.g., in a court proceeding) or where it is essential to an effective investigation (in which case, this will be discussed with the whistleblower beforehand).

4.2. Anonymous Reporting: Individuals may choose to make a report anonymously. However, anonymous reports can be more difficult to investigate, as it may not be possible to ask follow-up questions or verify the information provided. We encourage individuals to provide their name to facilitate a thorough investigation, with the assurance of the confidentiality protections outlined above.

5. Protection Against Retaliation

5.1. Zero Tolerance for Retaliation: Corelink Consulting Limited has a zero-tolerance policy for any form of retaliation, harassment, or victimisation directed against a whistleblower. Any employee found to have engaged in such conduct will face serious disciplinary action, up to and including summary dismissal.

5.2. Right to Protection: A whistleblower who makes a report in good faith is protected under this policy and the Public Interest Disclosure Act, even if the investigation ultimately does not confirm the allegations.

5.3. Malicious Allegations: If an investigation concludes that a report was made maliciously, in bad faith, or with knowledge of its falsity, the individual making the report will not be protected by this policy and may be subject to disciplinary action.

6. Reporting Procedures: How to Raise a Concern

We encourage raising concerns internally in the first instance. However, we recognise this may not always be appropriate.

Step 1: Immediate Reporting Channels

- **To your Line Manager:** For many issues, your immediate supervisor or line manager is the most appropriate person to report to.
- **If your concern involves your Line Manager or you are uncomfortable reporting to them,** you should proceed to Step 2.

Step 2: Designated Whistleblowing Officer (DWO)

The Company has appointed a Designated Whistleblowing Officer (DWO) as a primary, confidential point of contact for all concerns under this policy.

- **Primary DWO:** Susan Chishimba
- **Secure Email:** whistleblowing@corelink.co.zm
- An alternate DWO is available if the concern involves the primary DWO:
- **Alternate DWO:** Rowan Vos
- **Contact Details:** rowan@corelink.co.zm

When making a report, please provide as much detail as possible, including names, dates, places, the reason for the concern, and any supporting evidence.

Step 3: External Reporting

If you feel unable to use internal channels, or if your concern has been raised internally but not addressed, you can report your concerns to the appropriate external authorities in Zambia. These include:

- **Anti-Corruption Commission (ACC):** For matters of corruption and bribery.
- **Drug Enforcement Commission (DEC) - Anti-Money Laundering Investigations Unit:** For fraud, money laundering, and financing of terrorism.
- **Financial Intelligence Centre (FIC):** For suspicious financial transactions.
- **Zambia Police Service:** For criminal matters.
- **Human Rights Commission:** For matters of sexual harassment and discrimination.

7. The Investigation Process

7.1. Acknowledgement: Upon receipt of a report, the DWO will formally acknowledge receipt in writing within five (5) business days, provided the whistleblower can be contacted.

7.2. Initial Assessment: The DWO will conduct an initial assessment to determine whether the concern falls under this policy and whether a formal investigation is required.

7.3. Formal Investigation:

- If a formal investigation is warranted, the DWO will appoint an impartial investigator (who may be internal or an external expert).
- The investigation will be conducted fairly, objectively, and in a timely manner.
- The principles of natural justice will be applied, meaning the person(s) subject to the allegation will be informed of the claims and given an opportunity to respond.

7.4. Feedback: The DWO will provide the whistleblower with periodic updates on the progress of the investigation, subject to confidentiality constraints.

7.5. Outcome and Action: Upon conclusion of the investigation, a report will be submitted to senior management. If the allegations are substantiated, the Company will take appropriate action, which may include disciplinary proceedings, changes to policies and procedures, or reporting the matter to the relevant external authorities. The whistleblower will be informed of the outcome of the investigation, where appropriate and lawful to do so.

8. Responsibilities

- **All Employees:** Have a responsibility to read and understand this policy, to report any Reportable Conduct in good faith, and to cooperate with any investigation.
- **Management:** Are responsible for creating an environment where staff feel safe to raise concerns, ensuring those who report are not subjected to any Occupational Detriment, and escalating any reports they receive to the DWO.
- **Designated Whistleblowing Officer (DWO):** Is responsible for maintaining the confidentiality of all reports, ensuring investigations are conducted properly, and managing the overall whistleblowing process.

9. Training and Awareness

The Company will provide training to all employees to ensure they are aware of this policy, understand its importance, and know how to raise a concern. This policy will be made available to all staff via the company intranet and during induction.

10. Policy Review

This policy will be reviewed by the Board of Directors annually, or more frequently if required by changes in legislation or company structure, to ensure its continued effectiveness.

11. Governing Law

This policy is governed by and shall be interpreted in accordance with the laws of the Republic of Zambia.

Signed by:

A handwritten signature in blue ink, appearing to be 'S Chishimba', written in a cursive style.

Susan Chishimba

Director, Corelink Consulting Ltd.

Date: 15th February 2025

A handwritten signature in black ink, appearing to be 'Rowan J. Vos', written in a cursive style.

Rowan J. Vos

Director, Corelink Consulting Ltd.

Date: 15th February 2025