

IMC WORLDWIDE GROUP WHISTLEBLOWING POLICY

The IMC Worldwide Group (IMC) believes strongly in accountability, transparency and respect for individuals. All employees, and programme personnel¹, company Directors, and third parties are encouraged to raise genuine concerns about possible misconduct in our operations, whether in matters of financial reporting or in any other matter not specifically addressed in our other policies. This is particularly important when the possible misconduct may negatively impact the beneficiaries of the IMC Worldwide Group.

1 ABOUT THIS POLICY

1.1 Our Whistleblowing policy is designed to:

- Support the values and mission of the IMC Worldwide Group.
- Ensure that employees, programme personnel, company Directors, and third parties can feel comfortable raising concerns without fear of retribution.
- Provide a transparent and confidential process for dealing with concerns including, but not limited to: financial transactions, financial reporting, fraud/corruption, bribery, blackmail, criminal offenses, failure to comply with legal or regulatory obligations; sexual exploitation and abuse, harassment, endangering the health and safety of other individuals; endangering the environment; concealment of any of the foregoing concerns.

This policy extends to all IMC Worldwide Group activities and extends to programme personnel, company Directors and other partner and beneficiary organisations with which we work.

2 DUTIES AND OBLIGATIONS OF EMPLOYEES AND PROGRAMME PERSONNEL

2.1 If any employee, team member has a concern about possible misconduct, s/he is obligated to report it immediately, either orally or in writing. Any such report should include full details and, if possible, supporting evidence. If a report is made anonymously, it is more difficult for the IMC Worldwide Group to take action.

2.2 Employees should report any concerns in the following order:

- To your line manager (or, if not appropriate);
- To the IMC HR Manager (or, if not appropriate);
- To another member of the senior management team (or, if not appropriate);
- To the IMC independent Whistleblowing service².

¹ Programme personnel being staff working on IMC Worldwide Group projects - IMC employees, independent consultants or staff engaged through sub consultancy firms.

² Or if appropriate (FCDO funded projects) to FCDO Counter Fraud and Whistleblowing Unit reportingconcerns@fcdo.gov.uk or on +44(0)1355 843747

- 2.3 Programme personnel should report any concerns in the following order:
- To the IMC Team Leader or Project Manager (or, if not appropriate);
 - To the IMC Project Director or Regional Director (or, if not appropriate);
 - To The IMC Worldwide Group's Managing Director (or, if not appropriate);
 - To IMC's independent whistleblowing service³.
- 2.4 Employees or Programme personnel who in good faith raise concerns covered by this policy shall be treated fairly and protected from victimisation and other detrimental treatment.
- 2.5 Employees or Programme personnel shall fully cooperate with any investigations conducted by the IMC Worldwide Group.
- 2.6 Those wishing to raise a concern who are not an employee or team member should make a report through our independent whistleblowing service (see section 4).

3 DUTIES AND OBLIGATIONS OF THE IMC WORLDWIDE WORLDWIDE GROUP

The IMC Worldwide Group shall treat all concerns brought to our attention seriously and in accordance with this policy.

- 3.1 The IMC Worldwide Group shall consider whether the alleged misconduct falls under the area of "whistleblowing" contained in this policy or whether another policy (e.g. Business Ethics Policy, Anti-Harassment and Bullying Policy, Safeguarding Policy etc.) may better apply to the alleged misconduct.
- 3.2 If the IMC Worldwide Group determines that an investigation is warranted, we shall conduct a thorough and confidential investigation to the extent possible. Complete confidentiality protecting the identity of the individual who raised the report may not always be possible. If an employee or team member's identity must be disclosed, s/he will be advised prior to disclosure unless there is legal requirement or police advice not to do so.
- 3.3 In the course of any investigation, the IMC Worldwide Group shall ensure that any person accused of alleged misconduct is fairly treated at all times and has the right to present his/her own account of events as early as possible during the investigation.
- 3.4 Investigations relating to the IMC Worldwide Group's Safeguarding Policy will be carried out according to the IMC Worldwide Group's Safeguarding Investigation Policy.
- 3.5 The IMC Worldwide Group will investigate, and treat as a serious matter:
- Allegations made by an employee or team member which are not in good faith and are found to be false or malicious.
 - Actions by an employee or team member intending to either prevent a fellow colleague from making a confidential report or victimise that employee or team member for raising concerns.
- 3.6 Intentional false reporting of misconduct is prohibited and will result in termination of the IMC Worldwide Group employee, independent consultant or sub consultancy Agreement.
- 3.7 The IMC Worldwide Group shall provide feedback to those who raise concerns in connection with this Whistleblowing Policy. Such feedback shall include what steps have been taken to investigate and address the concern. Under certain circumstances, however, there may be a delay in giving feedback or a limit to what can be shared based on the advice of police and/or legal counsel.

³ See above
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4 RAISING A CONCERN

Please note if any employee or member of our programme personnel has concerns or suspicions about unethical behaviour of another employee, director, independent consultant, partner, supplier or clients then please raise it immediately via the steps in section 2.2 or 2.3 respectively or through our independent confidential 24/7 Whistle Blowing hotline (below).

Via the online portal : www.imcworld.ethicspoint.com

Standard Phone Lines:

Country:	Telephone Number:
United Kingdom	0800 069 8413
United States	(844) 256-2194
Spain	900 997 947
Nepal	1 800 091 0103
Uganda	0800 113285

Collect Call Phone Lines:

Country:	Telephone Number:
St Lucia	1 (844) 248-2629
South Sudan	(503) 530-7027
Tonga	(503) 530-7028

1. From an outside line contact your local operator
2. Request a reverse charge or collect call to be placed to the United States, to the relevant country's number above
3. All reverse charge or collect calls will be accepted by the contact centre using an automated English message.

2 Stage Dialling Phone Lines:

Country:	Telephone Number:
Ghana	(844) 222-1740
Pakistan	(844) 222-1740

The above phone number's require 2 stage dialling to be completed to reach a communication specialist, this is due to the country not having a direct freephone line. For each call made the following steps must be taken:

1. From an outside line, for Pakistan Dial 00-800-01-001 and for Ghana dial 0-2424-26-004
2. When prompted, please enter the corresponding telephone number for your country.
3. You will then be transferred to one of our communication specialists to handle your report.



Gavin English, Managing Director, the IMC Worldwide Group

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