

Whistle-blower Policy

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| Title: Whistle-blower Policy | Division: Human Resources |
| No: HR-018 | REF: KVC/WBP/018/2024 |
| Prepared By: HR/Admin Assistant | Approved by: Director |
| Date: 25-10-2024 | Revision: 01 |

1.0 Objective

The purpose of this policy is to encourage employees and other stakeholders to report any unethical, illegal, or improper conduct within Kula Vyema Centre without fear of retaliation. The policy is designed to ensure that such reports are handled confidentially, thoroughly, and in good faith.

2.0 Scope

This policy applies to all employees, contractors, consultants, volunteers, and any individuals associated with Kula Vyema Centre. It covers any concerns related to unethical behavior, misconduct, legal violations, financial irregularities, or any action that could harm the company’s reputation or integrity.

3.0 Reportable Activities

Whistleblowers are encouraged to report any actions they reasonably believe to involve:

- Fraud, corruption, or embezzlement
- Violations of company policies, including breaches of research ethics
- Harassment or discrimination
- Violations of health and safety regulations
- Misuse of company resources
- Unlawful activities, including legal and regulatory non-compliance

- Any activity that endangers public health, safety, or the environment

4.0 Reporting Procedure

Any person who has knowledge of misconduct or unethical behavior is encouraged to report the issue as soon as possible through the following channels:

- Supervisor/Manager: Employees should first report concerns to their immediate supervisor or manager.
- Confidential Reporting: For sensitive matters, reports can be made confidentially to the HR department or directly to the Executive Director. A dedicated whistleblower email or hotline will also be provided below for confidential reports.

Email: info@kulavyema.org

Hotline: +25703868785

5.0 Protection against Retaliation

Kula Vyema Centre is committed to protecting whistleblowers from retaliation. Any act of retaliation, discrimination, or harassment against an individual for reporting concerns in good faith is strictly prohibited and will be subject to disciplinary action. Employees who feel they have been retaliated against should report it immediately to the HR department.

6.0 Confidentiality

All reports made under this policy will be treated with the utmost confidentiality. Information will only be shared with those who need to know in order to conduct a thorough investigation. Efforts will be made to protect the whistleblower's identity where possible, though anonymity may limit the ability to investigate thoroughly.

7.0 Investigation Process

Once a report is made, it will be promptly reviewed and investigated by the appropriate parties, such as HR or the executive team. The investigation will be

conducted in a fair and impartial manner. If the report is substantiated, corrective actions will be taken.

8.0 Good Faith Requirement

Reports should be made in good faith and based on a reasonable belief that the information disclosed indicates misconduct. Malicious or knowingly false reports will not be tolerated and may result in disciplinary action.

9.0 Accountability

Employees are encouraged to participate in maintaining a culture of transparency and ethical behavior. Any failure to report serious misconduct or intentional involvement in unethical activities will be considered a violation of this policy.

10.0 Policy Review

This policy will be reviewed periodically to ensure it remains relevant and effective. Updates will be made as needed to ensure alignment with legal requirements and best practices.