



## MISSION STATEMENTS

- To provide and Promote equality services in a transparency manner fo
- For the enhancement of Sustainable development for all without unlawful
- Procedures or acts that will may distroy the reputations of the Foundation
- and the third Parties

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**POLICY TAGLINE:**  
CONSTITUTION, STATUE, CODE  
OF CONDUCT AND COMMUNITY  
ENGAGEMENT

# INTEGRITY POLICY

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## 01 INTRODUCTION

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### Objective and scope of the Integrity Policy

This Integrity Policy sets out in detail the rules and responsibilities which each Foundation Member must adhere to on the following matters: bribery and corruption, gifts and hospitality, sponsorship and donations, fraud, money laundering, conflicts of interest, third party vetting and raising concerns.

**Pre-existing policies covering these areas are retired with this policy.**

Non-compliance with the Integrity Policy (or other Compliance Policies) will not be **tolerated** and may result in **disciplinary action**. The disciplinary action will vary according to the severity of the non compliance but could include the cancellation of the Member's bonus, postponement of promotion, suspension without pay, termination of Member or employee or being reported to the authorities.

### Compliance roles and responsibilities

All members are responsible for ensuring that we adhere to the Code of Conduct and other Compliance Policies, including the Integrity Policy.

The General Managers ("GM"), Chief Operation Officer (COO) in relation to their respective subordinates;

- are accountable for compliance with this Policy and additional approvals as required by this policy;
- must approve all sponsorships and donations relating to healthcare and Child Development

The members of the focal points in relation to the CEO, and GDP in their respective areas of responsibility,

- bear the role and responsibility assigned to the COO

### HR Managers are required to,

- authorize any relevant outside paid or unpaid engagements including employment.

### Community engagement officers are required to,

- pre-approve all advocacy activities and groups/individuals engaged by GCFSFF for this purpose;
- maintain a register of all such engagements and gifts/hospitality for government officials.

### Medical / Health Care Nutrition Managers are required to,

- maintain a register of all HCP gifts and hospitality provided.

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The members' CEO+1s are required to, pre-approve gift & hospitality under the conditions laid out in section 3.;

- pre-approve interactions with government officials where there is a proposed transfer of value;
- work to resolve any conflicts of interests that are declared to them.

### **The Climate Compliance Officers (“CCO”),**

- advise and support the GMs and all functions in the respective Climate in relation to the application of this policy and retain external counsel where necessary;
- pre-approve gift & hospitality to government officials under the conditions laid out in section 3;
- prepare and approve sponsorship and donation agreements;
- approve interactions with government officials where there is a proposed transfer of value;
- contact Chief Financial Officer (CFO) Compliance where they believe money laundering may have occurred or been attempted.

### **The Zambia Regulations Compliance Officers (“ZRCO”)**

- provides guidance concerning general questions on the application of this Policy.

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## 02 BRIBERY AND CORRUPTION

### Definition of bribery and corruption

Bribery is the offence, giving or receipt of a financial or non-financial advantage (such as a gift) to bring about the improper performance of a person in a position of trust or where a function is expected to be performed impartially or in good faith. Corruption is the abuse of power for private benefit. This includes peddling of influence.

***Bribery and corruption are illegal the world over*** and can have sanctions for both individuals and companies. Many enforcement agencies pursue bribery and corruption offences committed not only within their local jurisdiction but also abroad.

Bribery and corruption can take many forms. They are not just cases of envelopes filled with cash but can include, for example, hiring a customer's relative in return for business. We must also ensure that we do not give, offer or receive anything which could from an outsider's perspective reasonably be perceived as a bribe.

While acts of bribery and corruption are often carried out directly by a company's employees, they can also be conducted by a third party working on the company's behalf, such as a sales agent. A Organization is often equally liable whether the bribery or corruption was committed by the employee or by a third party associated with it.

### Foundation's policy on bribery and corruption

The Foundation has a **zero tolerance policy** on bribery and corruption. This is not only because bribery and corruption are illegal, with heavy penalties for both individuals and corporations, but also because ***bribery and corruption undermine the economic and social development*** of countries. This is directly opposed to Foundation's 'dual commitment' to achieve not only business success but also social progress through our operations.

This includes 'facilitation payments', which are typically small payments (including non-financial, 'in kind' payments) made to speed up routine government actions, such as customs clearance. The only exception for facilitation payments is where not doing so would put a member's life and/or safety in danger. In this instance the payment may be made but must be immediately reported to a compliance or security representative and appropriately recorded in the books and records. Likewise, any requests for bribes or facilitation payments must be immediately reported to a compliance or security representative

## 03 GIFTS AND HOSPITALITY WITH THIRD PARTIES

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### Definition of gifts, hospitality and third parties

The term ‘**gifts**’ includes any item of value, such as discounts, gift cards, cash, favors, subsidies, presents, loans, goods, sexual Activities, equipment or services. The term ‘**hospitality**’ includes meals, travel expenses, accommodation, training and entertainment such as sports events.

The term ‘**third parties**’ refers to any non-Foundation individual or organization with whom we may come into contact as part of our work at Foundation, including, but not limited to, clients (existing or potential), Community members, Healthcare Organizations or victims, Organizations, business partners, sponsorship or donation recipients, government officials, potential joint venture partners and merger or acquisition targets.

The Integrity Policy is not concerned with gifts or hospitality given by Foundation to its own employees. More specific rules may apply regarding relations with healthcare professionals. Please refer to Foundation’s rules contained in the “Medical Policy” and the “Statue” for information on Foundation’s gift and hospitality requirements for interactions with external, Healthcare Organizations (“HCOs”) and Parents(“Ps”)

### 1. Rules for gifts and hospitality granted or received by Foundation.

Having a good working relationship with our third parties is very important to the Foundation, and in the course of business there may be occasion to exchange gifts or hospitality. However, it is vital that any gift or hospitality offered, given or received by Members is legitimate, reasonable and proportionate, and could not be construed (e.g. by a colleague, a competitor, a member of the public or an authority) as a bribe or inducement.

Foundation has chosen to provide a set of principles rather than global limits on gifts and hospitality, trusting in the good sense and responsible behavior of Members. This means, however, that Foundation members/employees must live up to these expectations, and spot checks and audits will be used to monitor compliance. The rules laid out here apply equally to gift or hospitality offered or given to family, spouses of third parties or of Members.

#### 1. Gifts and hospitality must be:

- permissible under applicable laws and regulations;
- infrequently given to or received by the same recipient;
- given or received openly with no reasonable appearance of improper purpose and without expecting or requesting anything in return; and
- of a proportionate value in relation to the recipient’s geographic location and standard of living (i.e., that you would not be embarrassed if you told your family or colleagues or if it

was reported in the news).

**2. Gifts and hospitality may not be given, received or promised if they are:**

- cash or cash equivalent (e.g. discount, gift cards, stocks, loan, or services);
- related to the granting of any license, permit or contract (or equivalent); or
- granted during tender or contractual negotiations. As a matter of principle, Members are not permitted to allow suppliers to pay for our travel or overnight accommodation. Unless, approved by compliance Officers

**3. Gifts and hospitality given, received or promised must be pre-approved in writing by the Foundation's Compliance Officers if:**

- the gift is above an insignificant value for the location/geography (e.g., something that is – taking into account local culture and customs – a gesture of courtesy and symbolic which cannot possibly be misconstrued as a bribe or inducement);
- the hospitality is not part of normal business relationships (i.e. working meals and modest hospitality at business events); or
- the gift or hospitality is granted outside tender or negotiation periods but if it is to be reasonably expected that a tender or negotiations with the respective party will take place in the near future, or have only recently been concluded.

**4. Gifts or hospitality for a government official**

**2 must** be pre-approved in writing by the Foundation's Compliance Officers and by the CEO unless the gifts or hospitality are of inconsequential value for the location/geography, appropriate and, taking into account local culture and customs, could not be misconstrued under the scrutiny associated with public office. The value of gifts or hospitality that could be perceived as undue influence will normally be lower for a government official than another recipient.

- ★ Pre-approval by the Compliance Officers and by the CEO remains always necessary if the hospitality is not part of normal business relationships (i.e. working meals and modest hospitality at business events); or
- ★ the gift or hospitality is granted outside tender or negotiation periods but if it is to be reasonably expected that a tender or negotiations with the respective party will take place in the near future, or have only recently been concluded.

5. The compliance, when assessing the admissibility of gifts and hospitality must take into consideration all the factors outlined above. In particular the compliance officers must assess whether the gift or hospitality could unduly influence or be perceived as unduly influencing the recipient with regard to local custom and the recipient's ordinary lifestyle and practices. The compliance officers may only approve that Foundation pays for

## INTEGRITY POLICY

- Foundation follows the Corruption definition of a government official as any person holding a legislative, administrative or judicial office of a country, whether appointed or elected; any person exercising a public function for a country, including for a public agency or public enterprise; and any official or agent of a public international organization. customers' travel or overnight accommodation on the basis of a specific, legitimate and documented business purpose

### Gift and hospitality registration requirements

Any giving of gifts or hospitality must be clearly specified as such in all expense forms or other relevant documentation, setting out who the gift or hospitality was for, their role and their Organization.

Detailed receipts or invoices must be provided to support the expenditures incurred for the items provided in line with Foundation's Meeting, Travel & Expense Policy. Gifts and hospitality, given or received, must be accurately recorded in the Organization's books and records.

Any gifts or hospitality, given or received, between Foundation and international Organizations ("IOs") or Foundation and government officials must be properly registered (e.g. with the local Authorities, Climate Compliance Officers, and the local Public Affairs team for government officials).

### Compliance specific rules

Each Compliance Department can adopt more specific policies/directives on gifts and hospitality requirements if they are in line with or more stringent than the rules set out in this Policy.

Such local policies/directives may in particular:

- fix thresholds for gifts & hospitality of insignificant value for the location/geography that do not require pre-approval; such thresholds must reflect local costs, customs, standards of living and whether the recipient or giver is a government official.
- Define categories of gifts & hospitality which are exempted from pre-approval requirements; the nature or type of such gifts or hospitality should be common place and customary in the local market such as a book, a small decorative ornament, or a bottle of wine. Exempted categories of gifts and hospitality for government officials should be of inconsequential value and appropriate (such as a cup of coffee/tea, a light meal or snack, bouquet, or relevant reading material). The value of gifts or hospitality that could be perceived as undue influence will normally be lower for a government official than another recipient.

Each Compliance Department can delegate the competence to fix thresholds for gifts & hospitality or to define categories for gifts & hospitality which are exempted from pre-approval to the Compliance Officers. Any such thresholds or categories of gifts & hospitality must be appropriately communicated to the members in the respective teams.



## 04 SPONSORSHIP AND DONATIONS

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### Definition of sponsorship and donations

Sponsorship and donations refer to any financial payment, or other support using Foundation's assets, to a third party with the direct aim of either promoting our products, services or Organization (sponsorship) or providing a contribution in money or kind to a charitable or community organization without the expectation of anything in return (donations). Examples of sponsorship include sporting events or workshops or Training Programs. Examples of donations include emergency relief donations to recognized charities, product donations to local Authorities, Organization or cooperatives in the communities in which we work, or employee volunteering time to provide professional support to charities.

### Foundation's policy on sponsorship and donations

Sponsorship can be an important channel for promoting our organization, while donations are one of the many methods through which we support the communities in which we work. However, sponsorship and donations also present a risk of being used for corrupt purposes to obtain undue business influence. **This is not allowed at the Foundation and is not tolerated.** It is also important to remember that **we do not make corporate political donations**. In order to engage in sponsorship or donation activities there are some key rules which we must follow:

- the proposed sponsorship or donation must be in line with our values and the principles set out in our Code of Conduct, Community engagement policy and must be permissible under all applicable laws and regulations;
- the sponsorship or donation must be made to a visible 3.
- there must be no possibility that the proposed sponsorship or donation could be seen as a means of trying to bribe a third party;
- the proposed sponsor partner or beneficiary organization must go through third party vetting prior to approval 4.
- there must be a written request for and an agreement to give sponsorship or donations between Members and the recipient organization, clearly stating the purpose of the relationship and the value of the sponsorship or donation;

3 See Foundation's rules contained in the Executive procedure Policy for further guidance on activities and interactions with these third parties.

4 All sponsorship and donations relating to the public Services must go through the relevant third party vetting process (as outlined in section 9 and the Third Party Vetting Directive)

- the sponsorship or donation agreement must be approved by the Compliance Officers and signed off by the relevant department head;

## INTEGRITY POLICY

- all sponsorship and donation activity must be accurately recorded in Foundation's files.

**Reminder:** For sponsorships and donations in the healthcare sector (including for medical events, congresses or engagements with HCPs) please also see Community engagement policy and code of conduct rules.

**all** sponsorship and donations relating to healthcare must be approved by the Compliance Officers General Manager and go through third party vetting

## 05 ENGAGEMENT WITH GOVERNMENT OFFICIALS

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**As part of Foundation's normal operations,** Meetings may be organized and take place with government officials to discuss legitimate Operations such as regulatory changes, product approvals, registrations, regulatory inspections etc. To ensure that these meetings are conducted appropriately and to minimize any actual or perceived impropriety or corruption, **they should be held in an open and transparent manner.** Any hospitality provided should be subordinate to the purpose of the meeting and must be customary only and acceptable according to the standards set out in section 3, above. Where possible, meetings should take place at official government offices. In general, commercial services performed by government officials for Foundation, such as consulting services, are strongly discouraged. Engaging a government official is allowed only if the official's knowledge and expertise are considered to be of unique value, and if allowed by local laws and regulations and any code of practice applicable to the government official. Written approval from the government official's employer must also be obtained previously. The Third Party Vetting Directive must be followed prior to engagement.

To ensure that interactions with government officials are transparent and monitored, all relevant documentation, including any required internal and external authorizations and approvals, must be retained.

All interactions where a transfer of value is envisaged must be pre-approved. Documentation maintained must detail the purpose of the interaction, date, attendees (including title/function) and the monetary value transferred.

Examples of red flags include, but are not limited to:

- payment related to a government expense is made to an individual;
- payment related to a government entity is made in cash, as opposed to a Organization cheque or wire transfer;
- travel expenses for customers, particularly government officials for which there is no legitimate business purpose;
- payment to an entity that is owned or influenced by the government official;
- spouse joining the trip to visit a manufacturing site as part of a regulatory inspection.

## 06 ADVOCACY

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Foundation's public policy activity is dedicated to advancing a supportive environment for Community and Sustainable development that will bring new and enhanced innovations to our people around the world. As such, we endeavor to work in partnership with governments, associations, Community, traditional leaders and other stakeholders on the development of legislative regulations, policies and procedures and related programs that balance continued innovation and development while improving outcomes for Sustainable Future and recognizing the central role of governments in policy-making.

Partnering with public policy and advocacy groups is a key element of our work and selecting the right groups and associations to partner with is important. While there is no universally agreed definition of advocacy activities, it is generally recognized as a legitimate and necessary part of our democratic processes where individuals, associations and corporate entities reasonably want to influence decisions that may somehow affect them. Such groups are generally external facing non-governmental or not-for-profit organizations such as NGOs, associations, trade unions, single-interest groups or so-called "think tanks".

In Zambia, advocacy activities are regulated by law or certain established processes of "good practice". In addition, Foundation applies certain criteria together with its Integrity Policy and Code of Conduct and Community Engagement policy that should apply in selecting our advocacy partners and ensuring any interaction is conducted openly and transparently. The following criteria should be considered prior to engaging any particular public policy/advocacy group (or individual):

- Is the group's mission aligned to that of Foundation, to our ethical values and standards of integrity?
- Does the group have a good reputation and is it seen as a credible organization by external parties?
- Is the work produced by the group recognized as being of high quality?
- Are we clear on the benefits and value of our proposed membership and is it similar to our membership arrangements with other groups?
- Does the group have its own ethics and integrity standards and a credible governance framework?
- Who are the other members of the group and are we comfortable with them?
- Do we know how funds provided by Foundation will be used and, in particular, that they will not be used to make any political, Sexual exploration contributions or donations or used for inappropriate or excessive entertainment/hospitality?

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All advocacy activities and groups/individuals engaged by the Foundation must be communicated to and pre-approved by the responsible party. Public Affairs must maintain a register of all engagements at executive level. All groups/individuals engaged must be vetted in accordance with the Third Party Vetting Directive requirements.

For advocacy activities in Zambia only third parties that are formally registered can be engaged.

## 07 MONEY LAUNDERING

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### Definition of money laundering

The term 'money laundering' is generally understood to describe the process of introducing assets which are the proceeds of crime into a legal financial system and hiding their true source.

Foundation's policy on money laundering In most countries, Zambia inclusive money laundering is a crime, and in some instances failure to report suspicion of money laundering can also be a crime. As the Organization we reject any attempt to use our activities to launder money and will only work with legitimate Organizations, Individuals, third parties and sponsorship or donations partners.

We must ensure that we have an official identification document from relevant third parties prior to starting our operation relationship with them, and that we seek to determine the actual beneficial owner of the third party. If any of the following 'red flags' occur during the contracting process with the third party the CEO must be informed:

- the third party wishes to pay or be paid a significant amount in cash (e.g. over €10,000 or a lower amount in countries where cash is not the normal means of payment);
- the identity of the payment recipient is unclear – e.g. the payment account name is different from that of the contracting party;
- the transaction is being made into or via a location which is different from the one where the third party or the services provided are based and for which there is no logical explanation, or it is being made into a known tax haven or non-cooperative state or territory.
- the third party requests that the funds are transferred in a different currency to the one specified in the contract or invoice or that several different payments are made to settle one single invoice;
- the third party refuses to provide requested information without a reasonable explanation; • there is involvement of an unconnected third party without a logical reason or explanation;
- there are over payments by a third party which are subsequently requested back or there is a cancellation or reversal of an earlier transaction. Where the relevant Financial Controller or Organization believes that money laundering may have occurred or been attempted they must immediately contact Zambia Compliance Board.

5 The term 'customer' refers to business customers as opposed to consumers.

## 08 CONFLICTS OF INTEREST

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### Definition of conflicts of interest

Conflicts of interest can occur when an employee's personal, social, financial or political interests could influence (or appear to influence) the employee's loyalty to the Foundation or their ability to carry out their duties for Foundation objectively.

For example, if an employee's N+1 or N+2 at the Foundation was a relative or close friend, the objectivity of the supervisor regarding the employee's ability, promotion or pay could be in doubt.

Similarly, if an employee working in procurement or sourcing either had a financial interest in, or had a relative who worked in, a Organization or company, which provided services to the Foundation, the objectivity of the employee's judgement and the price competitiveness of the services could be questioned. Likewise, if a member took on a directorship or role in another organization, company outside of their working hours for Foundation, the employee could be suspected of not focusing on their responsibilities at Foundation or of using Foundation's resources to carry out their second role.

### Foundation's policy on conflicts of interest

At the Foundation all of our operation decisions must be based on clear, objective and transparent criteria.

Whenever we find ourselves in a potentially conflicted situation we must ask ourselves 'would I trust the judgement of someone else in my position who had the same potential conflict of interest?' Conflicts of interest are sometimes unavoidable, but they can very often be managed in such a way that the conflict is mitigated. For example, removing an HR Manager from the selection process for a role for which their friend has applied.

The most important thing is that we declare potential conflicts and that they are managed correctly in order to mitigate the conflict. Any Member with a potential conflict of interest is required to document how it has been managed. The following rules must be followed by all Foundation's Member;

- potential recruits must declare to HR/Chief Operation Officer, whether they have any conflicts of interest prior to joining Foundation;
- for existing Foundation members or employees, any potential conflicts of interest must be declared immediately to the employee's team who will work with that employee to resolve the conflict, reporting any concerns to the Compliance officers. The employee may alternatively choose to declare to his local HR manager;
- where a conflict of interest arises in relation to the procurement of any goods or services from a third party, the same escalation procedure must be respected. The conflict of interest situation may be resolved by:

– Refraining from procuring the goods/services,

## INTEGRITY POLICY

- Removing the individual conflicted from the procurement process;
  - Seeking additional competitive quotes to determine appropriateness of fair market value to the Foundation and require independent approval of the relevant department Head. In particular the following conflicts of interest must be declared immediately to the employee's Team and/or HR Manager
    - Personal workplace relationships, i.e. a member:
      - is in a supervisory, subordinate, or control relationship (e.g., having influence over conditions of employment) with closely related persons;
      - is involved in any hiring decision regarding closely related persons (including internal/external hiring and internal transfers).
        - Outside engagements including employment, i.e. a member has any kind of paid or unpaid engagement with:
          - a Organization business partner or competitor;
          - any other person or company if this impacts their performance at the Foundation.
    - Personal financial relationships/relationships with third parties and competitors, i.e; a Foundation:
      - owns any interest equal to or greater than 10% in any company which competes with or does business with Foundation
      - conducts Foundation business with any entity in which they have a substantial interest or with which they have a substantial affiliation.
- Foundation must not directly or indirectly:
- solicit or receive a fee, commission, service, or other favor from any actual or potential Foundation business partner or competitor;
  - acts as a paid official of or advisor or consultant to any government agency with regulatory or supervisory power over Foundation.



## 09 THIRD PARTY VETTING

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### **Definition of third party vetting**

The term 'third party vetting' refers to the ethics and compliance checks conducted on operation partners, customers, sponsorship or donation or grant givers or donors and, under a separate process, potential joint venture partners, merger or acquisition targets to make sure that they share our business principles.

### **Foundation's policy on third party vetting**

All operations require collaboration with third parties in order to operate. However, collaboration with a corrupt or unethical partner would expose the Foundation to significant compliance, financial and reputational risks. It is therefore vital that we know who we are dealing with, are confident that they share the same principles as us and that we are satisfied that the contractual and remuneration terms are adequate to protect the Foundation. In line with international best practice and legal guidance, at the Foundation we take a risk-based approach as to which third parties we need to vet. This allows us to manage our resources better and to focus on the areas which carry the highest risk. In order to adequately monitor and control our risk, our aim is to carry out vetting before starting a relationship with relevant third parties and then again on a periodic basis.

### **Additional practical controls**

In addition to checking that the potential third parties we work with share our principles, we must also make sure that we put in place practical controls to prevent unethical behavior. These include:

- requiring our third parties to sign up to our Code of Conduct, and Partnership policy.
- ensuring that our third parties have a written agreement with us which has been approved as per the required approval authorities, which sets out the required services we expect from them and that evidence is received that these services are being provided (e.g. periodic activity reports for higher-risk third parties);
- putting in place compensation packages that are reasonable, justified and clearly set out in contracts or other written agreements;
- conducting audits on high-risk third parties as necessary;
- having clear contract terms in place – The Foundation should always avoid overly-long contract terms with high-risk third parties. A detailed third party vetting process and related procedures are set out in a separate, dedicated directive.

## 10 FRAUD

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### Definition of fraud

Fraud can be defined as any act of intentional or willful dishonesty to gain an individual advantage.

**It is a criminal activity.**

Fraud includes actions ranging from direct theft of Foundation's assets to embezzlement, misuse of property, corruption, conflicts of interest ("compliance" fraud), alteration of financial or other records, false reporting, manipulation of books or internal controls ("financial" fraud), non-compliance with Foundation's Travel and Expenses Policy ("Expense" fraud), or any unauthorized act which results directly or indirectly in financial gain to the perpetrator or third party. It also covers where a supplier provides us with ingredients which are not in line with those requested by Foundation ("food safety" fraud), mislabeling of products and insider trading ("regulatory" fraud).

[Foundation's policy on fraud prevention](#)

Fraud is not **permitted under any circumstances** by the Foundation. All Members are required, in accordance with procurement controls, to implement all elements of the Foundation Anti-Fraud program. Organization employees must report any suspicion of fraud or improper financial behavior immediately, either to their line manager or local Finance, HR, Legal, Food Safety or Compliance representatives. If these reporting options are not appropriate then concerns can also be raised via our Foundation Ethics Line system (see section 11 below)

## 11 RAISING A CONCERN

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### Definition of raising a concern ('whistleblowing')

Raising a concern or 'whistleblowing' is where a member or external party informs the Foundation of suspected wrongdoing. The scope of whistleblowing for the Foundation covers the behavior required by the Foundation as set out in our Code of Conduct, this Integrity Policy, and our other Compliance Policies. It also covers other kinds of unlawful behavior, financial malpractice and any activity which poses or could pose a danger to the environment or to anyone working for our organization

### Foundation's policy on whistleblowing

At the Foundation we want to know immediately about any breach or potential breach of Operation principles, any unlawful behavior, financial malpractice and any activity which poses or could pose a danger to the environment or to anyone working for our organization. We always encourage members to discuss any concerns directly with the relevant point of contact in the Organization (such as Team Managers or HR Manager, Finance Manager or Compliance).

However, should Members prefer to report a concern confidentially through another channel we also have a dedicated reporting tool available called Foundation Ethics Line. This tool can be used anonymously, if needed.

Anyone who reports a genuine good faith concern must not be retaliated against.

### Investigations

All concerns raised will be internally investigated appropriately, with the organization of the investigation managed by the Foundation Ethics Line Committee. The results of the investigation may be reported to the Corporate Compliance & Ethics Board (excluding any implicated members) who will be responsible for deciding on appropriate actions to be taken. Details on investigations are set out in the Internal Investigations Policy.