



Confidential Reporting Policy

07MAN-JSS-011




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Janus Proprietary Information

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Introduction from our MD

This Policy is to encourage our employees and others who have serious concerns about any aspect of the Company's work to come forward and voice those concerns.

As employees are often the first to realise that there may be something seriously wrong within a Company, I personally view Whistleblowing as a positive act that can make a valuable contribution to our Company's efficiency and long-term success.

I do not regard it as being disloyal to colleagues or our Company to speak up, as we are committed to achieving the highest possible standards of service to our clients and the highest possible ethical standards in public life and in all our practices.

To help achieve these standards I strongly encourage the freedom of speech.

Charles Skinner
Managing Director
Janus Global Operations Somalia FZC



Whistleblowing Confidential Reporting Policy

Definitions

The following provides definitions of the terms Complaint and Grievance:

- **Complaint:** A Complaint includes any complaint made by an individual or company which arises as a result of the alleged acts or omissions of Janus or any personnel (including contractors or employees engaged by it at the time the alleged acts or omissions took place) or any of its subcontractors
- **Grievance:** A Grievance is the cause of or grounds for a complaint

What is Whistleblowing?

In this policy Whistleblowing means the reporting by employees of suspected misconduct, illegal acts, or failure to act within the Company.

The aim of this Policy is to encourage employees and others who have serious concerns about any aspect of the Company's work to come forward and voice those concerns.

Employees are often the first to realise that there may be something seriously wrong within the Company. Whistleblowing is viewed by the Company as a positive act that can make a valuable contribution to the Company's efficiency and long-term success. It is not disloyal to colleagues or the Company to speak up. The Company is committed to achieving the highest possible standards of service and the highest possible ethical standards in public life and in all of its practices.

If you are considering raising a concern, you should read this Policy first. It explains:

- The type of issues that can be raised
- How the person raising a concern will be protected from victimisation and harassment
- How to raise a concern
- What the Company will do

What is the aim of the Policy and when does it apply?

Aims of the Policy

The Policy is designed to ensure that you can raise your concerns about wrongdoing or malpractice within the Company without fear of victimisation, subsequent discrimination, disadvantage, or dismissal.

It is also intended to encourage and enable you to raise serious concerns within the Company rather than ignoring a problem or 'blowing the whistle' outside.

This Policy aims to:

- Encourage you to feel confident in raising serious concerns at the earliest opportunity and to question and act upon concerns about practice
- Provide avenues for you to raise those concerns and receive feedback on any action taken
- Ensure that you receive a response to your concerns and that you are aware of how to pursue them if you are not satisfied



- Reassure you that you will be protected from possible reprisals or victimisation if you have made any disclosure in good faith.

Scope of this Policy

This Policy is intended to enable those who become aware of wrongdoing in the Company affecting some other person or service, to report their concerns at the earliest opportunity so that they can be properly investigated.

The policy is not intended to replace existing procedures as set out in the Staff Handbook and Code of Conduct and Business Ethics:

- If your concern relates to your own treatment as an employee, you should raise it under the existing grievance procedures
- If a client has a concern about services provided to him/her, it should be raised as a complaint to the Company
- Complaints of misconduct by the Company

Who can raise a concern under this Policy?

The Policy applies to:

- Employees of the Company
- Contractors working for the Company
- Employees of suppliers
- Those providing services under a contract to a client
- A person who wishes to raise a complaint or grievance regarding the Company or a specific individual employed by the Company

What should be reported?

Any serious concerns that you have about service provision or the conduct of employees of the Company or others acting on behalf of the Company that:

- Make you feel uncomfortable in terms of known standards
- Are not in keeping with the Company's policies or standard operating procedures
- Fall below established standards of practice
- Are improper behaviour

These might relate to though this list is not exhaustive:

- Conduct which is an offence or a breach of the law (a criminal offence has been committed or failing to comply with any other legal obligation)
- Disclosures related to miscarriages of justice
- Racial, sexual, disability or other discrimination
- Health and safety of the public and/or other employees
- Damage to the environment
- Unauthorised use of public funds or other assets
- Possible fraud and corruption
- Neglect or abuse of clients, or



- Other unethical conduct

Protecting the Whistleblower

Your legal rights

This policy has been written to take account of the UK's Public Interest Disclosure Act 1998 which protects workers making disclosures about certain matters of concern, when those disclosures are made in accordance with the Act's provisions and in the public interest.

The Act makes it unlawful for the Company to dismiss anyone or allow them to be victimised on the basis that they have made an appropriate lawful disclosure in accordance with the Act.

Rarely, a case might arise where it is the employee that has participated in the action causing concern. In such a case it is in the employee's interest to come into the open as soon as possible. The Company cannot promise not to act against such an employee, but the fact that they came forward may be taken into account.

Harassment or Victimisation

The Company is committed to good practice and high standards and to being supportive of you as an employee.

The Company recognises that the decision to report a concern can be a difficult one to make. If you honestly and reasonably believe what you are saying is true, you should have nothing to fear because you will be doing your duty to your employer, your colleagues and those for whom you are providing a service.

The Company will not tolerate any harassment or victimisation of a whistleblower (including informal pressures) and will take appropriate action to protect you when you raise a concern in good faith and will treat this as a serious disciplinary offence which will be dealt with under the disciplinary rules and procedure.

Support to you

Throughout this process:

- You will be given full support from senior management
- Your concerns will be taken seriously, and
- The Company will do all it can to help you throughout the investigation

If appropriate, the Company will consider temporarily re-deploying you for the period of the investigation.

For those who are not Company employees, the Company will endeavour to provide appropriate advice and support wherever possible.

Confidentiality

All concerns will be treated in confidence and every effort will be made not to reveal your identity if that is your wish. If disciplinary or other proceedings follow the investigation, it may not be possible to take action as a result of your disclosure without your help, so you may be asked to come forward as a witness. If you agree to this, you will be offered advice and support.



Anonymous Allegations

Janus management will not ignore a complaint, despite doubts about the complainant's motive or truthfulness. Failure to appropriately investigate a complaint, particularly where it issues such as bullying, can give rise to a personal grievance, or potentially result in a prosecution under the UK's Health and Safety at Work Act 2015. The extent of the investigation required will depend upon the seriousness and complexity of the allegations raised.

It is an important principle of natural justice that an accused employee is given the right to refute an allegation. If there are issues of credibility, for example, suggestions of collusion or maliciousness, then the employee will be at a disadvantage if they do not know the identity of the accuser.

If the complainant or witness wishes to remain anonymous, Janus management will consider whether they have sufficient evidence to proceed with the investigation without the information from the complainant or whether there is justification for withholding the complainant's identity. Janus management must have reasonable grounds to believe that there would be a genuine threat to the safety of the complainant if their identity was disclosed.

Post investigation, management will assure the complainant the issue has been fully investigated but inform him/her only of the general outcome of it. Whether it was upheld and what actions have been taken to prevent a recurrence. Management will not disclose details, or what, if any, disciplinary action was undertaken.

When conducting a disciplinary investigation, it may be necessary for management to speak to other employees to obtain evidence and gather witness statements. Some employees may wish to submit an anonymous statement or be reluctant to give out any information altogether.

If the matter proceeds to a formal disciplinary hearing, all evidence considered including any witness statements obtained, will be provided to the employee to ensure that they are aware of the allegations made against them. If they are unaware of what has been said and by whom, they may not be able to defend themselves fully and fairly against the allegations.

If the employee will only provide information as a witness if they are given the assurance of anonymity, management will establish the reason why the witness wants to remain anonymous, due to a fear of intimidation or violence from the accused employee.

If in the case of anonymising a witness, management is unable to guarantee complete anonymity, if the accused employee proceeds to a tribunal, a request for disclosure of the witness statements or the minutes to any interview in relation to the investigations may be made. This will identify the witness. Only in exceptional circumstances will anonymous statements be deemed reasonable by the employment tribunal.

Regarding complaints received from whistleblowers, if a disclosure falls within the Protected Disclosures Act 2000¹, the complainant may receive protection including confidentiality and immunity from civil, criminal, or disciplinary proceedings which might otherwise arise. Confidentiality and anonymity are limited as the Act provides that Janus as the employer can disclose the identity of the complainant if the principle of natural justice requires it.

¹ <https://assets.publishing.service.gov.uk/media/57a08c4840f0b64974001102/WEDC-PDA-PowerpointPresentation.pdf>



Untrue Allegations

If you make an allegation in good faith and reasonably believing it to be true, but it is not confirmed by the investigation, the Company will recognise your concern and you have nothing to fear. If you make an allegation frivolously, maliciously, or for personal gain, appropriate action that could include disciplinary action, may be taken.

Raising a Concern

Who should you raise your concern with?

This will depend on the seriousness and sensitivity of the issues involved and who is suspected of the wrongdoing. You should normally raise concerns with the Managing Director:

- Telephone: +44 (0) 79754 922 159 / +252 6169 03861 (English speaking)
- Telephone: +971 55 652 2200 (English and Somali speaking)
- Email: confidential.hotline@januservices.org
- Web portal: www.januservices.org

How to raise a concern

You may raise your concern by telephone, in person or in writing via email. The earlier you express your concern, the easier it is to take action. You will need to provide the following information:

- The nature of your concern and why you believe it to be true
- The background and history of the concern (giving relevant dates)

Although you are not expected to prove beyond doubt the truth of your suspicion, you will need to demonstrate to the person contacted that you have a genuine concern relating to suspected wrongdoing or malpractice within the Company and there are reasonable grounds for your concern.

You may wish to consider discussing your concern with a colleague first and you may find it easier to raise the matter if there are two (or more) of you who have had the same experience or concerns.

You may invite a representative or a friend to be present for support during any meetings or interviews in connection with the concerns you have raised.

What the Company will do

The Company will respond to your concerns as quickly as possible.

The overriding principle for the Company will be the public interest. In order to be fair to all employees, including those who may be wrongly or mistakenly accused, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take.

The investigation may need to be carried out under terms of strict confidentiality, i.e. by not informing the subject of the complaint until (or if) it becomes necessary to do so. In certain cases such as allegations of ill treatment of others, suspension from work may have to be considered immediately. Protection of others is paramount in all cases.



Where appropriate, the matters raised may:

- Be investigated by management, internal audit, or through the disciplinary/grievance process
- Be referred to the police
- Be referred to the external auditor
- Be referred and put through established child protection/abuse procedures
- Form the subject of an independent inquiry

Within ten working days of a concern being raised, the person investigating your concern will write to you:

- Acknowledging that the concern has been received
- Indicating how the Company proposes to deal with the matter
- Supplying you with information on staff support mechanisms
- Telling you whether further investigations will take place and if not, why not

The amount of contact between you and the officers considering the issues will depend on the nature of the matters raised, the potential difficulties involved and the clarity of your information. It is likely that you will be interviewed to ensure that your disclosure is fully understood.

Any meeting can be arranged away from your workplace, if you wish, and a representative or a friend may accompany you in support.

The Company will do what it can to minimise any difficulties that you may experience as a result of raising a concern. For instance, if you are asked to give evidence in criminal or disciplinary proceedings, the Company will arrange for you to receive appropriate advice and support.

You need to be assured that your disclosure has been properly addressed. Unless there are any legal reasons why this cannot be done, you will be kept informed of the progress and outcome of any investigation.

Anti-Retaliation and Whistleblower Protection

Regardless of how an employee reports a possible violation of the Code, Janus will seek, to the extent practical and appropriate under the circumstances, to maintain the confidentiality of the employee and of those employees who participates in any investigation.

Janus will not tolerate retaliation in any form, direct or indirect, against anyone who, in good faith, reports a known or possible violation of the Code or who participates in the fact-finding, even if sufficient evidence is not found to substantiate the concern. Janus will take appropriate action against any individual determined to be engaging in retaliatory conduct, which itself is a serious violation of this Code. Acts of retaliation should be reported immediately to the Managing Director or CEO.

Janus is committed to the protection of an employee or contractor, subcontractor, grantee, or subgrantee or personal services contractor may not be discharged, demoted, or otherwise discriminated against as a reprisal for disclosing to a person or body.

Information that the employee or contractor reasonably believes is evidence of gross mismanagement of a contract or a gross waste of funds, an abuse of authority relating to a contract, a substantial and specific danger to public health or safety, or a violation of law, rule, or regulation related to a contract including the competition for or negotiation of a contract.



Retaliation against an employee who makes a good faith report is against company policy and our values.

Retaliation will not be tolerated and will be responded to with disciplinary action, including termination from employment.

The Responsible Officer

The Managing Director has overall responsibility for the maintenance and operation of this Policy.

How the Matter can be Taken Further

This Policy is intended to provide you with an avenue within the Company to raise concerns. The Company hopes you will be satisfied with any action taken. If you are not, and you feel it is right to take the matter outside the Company, the following are the Company's prescribed contacts:

- Country Manager
- Managing Director
- Chief Executive Officer

If you raise concerns outside the Company, you should ensure that it is to one of these prescribed contacts. A public disclosure to anyone else could take you outside the protection of this Policy.

You should not disclose information that is confidential to the Company or to anyone else, such as a client, contractor, or supplier of the Company, except to those included in the list of prescribed contacts.

This Policy does not prevent you from taking your own legal advice.

Review of the Policy

The Company's Policy Committee will review this Policy annually.

Corporate Recording and Monitoring

The Managing Director will maintain a register containing all concerns that are brought to his attention.

The Managing Director will review the register and produce an annual report for shareholders and external auditors. The report will include a summary of the concerns raised, to whom they related, the post to which the concerns related (if not confidential) and any lessons learned. The report will not include any employee names.

The aim of this is to ensure that:

- The Company and/or the relevant department learns from mistakes and does not repeat them
- Consistency of approach

The register together with the annual reports will be available for inspection by internal and external audit, after removing any confidential details.



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