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## Action Resort for Change

### Whistle Blowing Policy

#### 1. Introduction

Action Resort for Change (ARC) is committed to maintaining the highest standards of integrity, transparency, and accountability. Employees, volunteers, and associates are encouraged to raise genuine concerns regarding suspected wrongdoing. Any disclosure made in good faith, where an individual reasonably believes that misconduct has occurred, is occurring, or is likely to occur, will be treated confidentially and the individual will be afforded whistle blowing protection.

#### 2. Purpose of the Whistle Blowing Policy

This policy aims to:

Provide a safe and supportive framework through which individuals can report suspected malpractice or misconduct.

Encourage openness and accountability across the organisation.

Ensure that individuals who become aware of wrongdoing understand their responsibility to report such concerns without fear of retaliation.

#### 2.1 Policy Statement

ARC endeavours to conduct all its activities in accordance with the highest professional, ethical, and legal standards. Integrity in our operations and management systems is fundamental to achieving our mission. This Whistle Blowing Policy reflects ARC's commitment to ensuring that concerns raised in good faith regarding potential breaches of laws, regulations, or internal policies are appropriately investigated and addressed.

#### 3. Policy Principles

a) All whistle blowers will be treated with strict confidentiality.

b) A whistle blower may choose to remain anonymous, although anonymity may limit the effectiveness of investigations.

c) Concerns should be reported to a senior manager, the Chief Executive Officer, or the Board Chairperson.

d) The Senior Management Team (SMT) must be informed of allegations and ensure that appropriate action is taken.

Wrongdoing covered under this policy includes but is not limited to:

i. Failure to comply with legal or regulatory obligations.

ii. Criminal offences or miscarriages of justice.

iii. Actions that endanger the health and safety of any individual.

iv. Fraud, corruption, or financial irregularities.

v. Offering, soliciting, or accepting bribes.

#### 4. Matters to Be Reported

Every ARC employee has a duty to report conduct that they reasonably believe involves one or more of the following:

- a) Criminal activity, including fraud, bribery, corruption, or financial misconduct.
- b) Serious breaches or potential breaches of applicable laws or government regulations.
- c) Questionable accounting practices or financial impropriety.
- d) Conduct that is significantly detrimental to ARC's interests or reputation.
- e) Actions that endanger the health or safety of employees, beneficiaries, or the public.
- f) Serious violations of ARC's internal policies or codes of conduct.
- g) Deliberate concealment of any of the above

#### 5. Reporting Procedures

- a) Concerns must be reported promptly to the Senior Manager, the Chief Executive Officer, or the Chairperson of the Board.
- b) The whistle blower must not confront the individual suspected of wrongdoing.
- c) The matter should not be discussed with other staff members.
- d) The whistle blower must not conduct a personal investigation, as this may compromise the formal process.

#### 6. Reporting in Good Faith

ARC ensures that all individuals who raise concerns in good faith will be protected from retaliation, discrimination, or any adverse treatment. Protection will not apply if it is determined that a report was knowingly false, malicious, or made with the intention of harming another individual. In such cases, the matter will be addressed through ARC's disciplinary procedures.

#### 7. Investigation Procedures

- a) All reported concerns will be investigated in an independent, impartial, and professional manner.
- b) The Senior Management Team, in consultation with the Chief Executive Officer, shall appoint an independent investigation team.
- c) Investigation findings and recommendations shall be submitted to the Executive Board for consideration and action.

All matters reported under this policy shall be formally recorded and handled with strict confidentiality. The investigation team will provide reasonable feedback to the individual who raised the concern, where appropriate. Management will work with relevant functional teams to implement corrective or remedial actions arising from the investigation.