

PII

WHISTLEBLOWING POLICY

Functional Area	PII Governance and Executive Department
Business Owner	General Counsel
Version	Final
Approval Body	International Board
Approval Date	16 June 2018 (Amendments approved 30 September 2020)
Effective Date	16 June 2018
Review Date	16 June 2023
Applicability and Exceptions	All Staff and Volunteers engaged by Plan International, Inc. or its subsidiaries including country offices, regional hubs, liaison offices and the Global Hub
Related policies	Global Policy on Values, Conduct and Whistleblowing; PII Code of Conduct; Global Policy on Safeguarding Children and Young People; PII Harassment, Bullying and Discrimination Policy, PII Grievance Policy, PII Disciplinary Policy.

PURPOSE

We are committed to conducting our work in accordance with Plan International's Values and Behaviours and to uphold the standards of the PII Code of Conduct. However, all organisations face the risk of things going wrong or of unknowingly harbouring illegal or unethical conduct. A culture of transparency and accountability is essential in order to prevent such situations occurring and to address them when they do occur.

Pursuant to the Global Policy on Values, Conduct and Whistleblowing, the aims of this policy are:

1. To encourage and enable Whistleblowers to report suspected wrongdoing within PII as soon as possible, in the knowledge that their concerns will be taken seriously and investigated where appropriate, and that their confidentiality and, if desired, anonymity will be respected;
2. To provide Whistleblowers with a safe, effective and accessible procedure for how to raise Whistleblowing Concerns; and
3. To reassure Whistleblowers that they should be able to raise genuine concerns regarding the conduct described below without fear of retaliation or reprisals, even if they turn out to be mistaken.

APPLICATION AND SCOPE

1. This Whistleblowing Policy applies to all Plan International, Inc. (PII) Staff and Volunteers.
2. Nothing contained herein is intended to provide any Whistleblower with any additional rights or causes of action, other than those provided by law. We further reserve the right to amend this policy at any time.
3. This Whistleblowing Policy is **not** designed for Staff and Volunteers to:
 - a. make a general complaint that does not fall under the definition of Whistleblowing;
 - b. raise issues of policy or strategy where there is no breach of applicable PII or Global policies or laws; or
 - c. express concerns about their individual terms and conditions of work. Staff and Volunteers are encouraged to use PII's grievance procedure in order that such concerns may be resolved and redressed.¹
4. This Whistleblowing Policy should be read in conjunction with local legislation (where possible).
5. This policy supersedes all prior policies, guidelines and practices that pertain to Whistleblowing.

ROLES AND RESPONSIBILITIES

- 1. All Staff and Volunteers shall be responsible for:**
 - a. Reporting any Whistleblowing Concerns they may have in accordance with the reporting procedure described below, as PII may amend in its discretion. Assist in any investigations of Whistleblowing Concerns by making available all relevant information and by cooperating in interviews.
- 2. Managers are responsible for:**
 - a. Ensuring that the principles of this policy are communicated and understood throughout their teams.
 - b. Escalating any reports of Whistleblowing Concerns they may receive to the appropriate Policy Administrator.

¹PII's Grievance Policy can be found at:
https://planet.planapps.org/Operations/HROD/Global_Policies/layouts/15/WopiFrame2.aspx?sourcedoc=/Operations/HROD/Global_Policies/Documents/Grievance%20Policy.pdf&action=default

3. The Policy Administrators (or their designees, and other than in cases where the Chair of the Members' Assembly or the Audit and Compliance Committee serve as Policy Administrators) shall be responsible for:

- a. Providing training, advice, guidance and ongoing support to Managers on the implementation and use of the Whistleblowing Policy;
- b. Determining the scope, if any, of investigation of Whistleblowing Concerns raised pursuant to this policy, determining who should undertake the investigation and ensuring that any subsequent investigation is promptly and properly managed;
- c. Facilitating the implementation by management of appropriate responses to recommendations made in Whistleblowing investigation reports;
- d. Providing the International Board with an annual summary report of reported Whistleblowing Concerns;
- e. The retention of all records of reported Whistleblowing Concerns and Whistleblowing investigations on a strictly confidential basis for the required periods under the PII Retention, Storage and Destruction of Key Documents Policy.

In cases where the Chair of the Members' Assembly or Audit and Compliance Committee serves as a Policy Administrator, their role is limited to that described in b. above.

- 4. The Chief Executive Officer is responsible for** ensuring the implementation and monitoring of the Whistleblowing Policy.
- 5. The International Board of PII is responsible for** overseeing management's implementation and monitoring of the Whistleblowing Policy.

PROCESS

1. Raising a Whistleblowing Concern

There are various channels open to Staff and Volunteers within PII for reporting Whistleblowing Concerns. These are summarized briefly below.

a. Staff and Volunteers

Staff and Volunteers are encouraged to report Whistleblowing Concerns to their line manager, a more senior manager up to and including a Director, their human resources business partner or the Policy Administrators. Reports may be made in person, by telephone or in writing.

Staff and Volunteers who are unable or would prefer not to report internally may alternatively use the independent Safecall confidential misconduct reporting facility.²

Safecall (Available 24 hours a day)	Telephone numbers available at https://planinternational.sharepoint.com/sites/planetapps/Operations/GlobalAssurance/Pages/Whistle-blowing.aspx Email: plan@safecall.co.uk Secure web portal: http://www.safecall.co.uk/file-a-report Website: http://www.safecall.co.uk
---	--

b. Third Parties

Third parties can report any suspected irregularities or wrongdoing by PII by raising their concern with a member of Staff or Volunteer. Third parties may also use the Safecall reporting facility.

c. External Disclosures

This Policy aims to provide an internal mechanism for reporting, investigating and remedying Whistleblowing Concerns. This does not, however, affect the right of Staff and Volunteers to report Whistleblowing Concerns to an external body (such as a regulator) where the individual believes this is the appropriate course of action. Whistleblowers should seek advice from a Manager, the Policy Administrators or Safecall before reporting Whistleblowing Concerns externally.

2. Confidentiality

Whistleblowers should feel comfortable reporting Whistleblowing Concerns openly under this Policy. Reports of Whistleblowing Concerns will be treated with the utmost confidentiality by all parties involved or otherwise aware of what has been reported, subject to any disclosures required as part of any

² Safecall is an external provider of an ethics telephone hotline and online reporting system, helping national and international organizations create a culture of integrity and openness. They have the ability to handle reports in over 170 languages. When an employee telephones Safecall they will automatically be offered a series of languages appropriate to the location they are calling from.

regulatory process or legal proceedings, about which the Whistleblower will be advised where possible prior to disclosure where possible.

Although not prevented from doing so, Whistleblowers are encouraged not to make anonymous disclosures since proper investigation may be prevented if investigators cannot clarify or obtain further information from the Whistleblower. Inability to obtain follow-up information from a Whistleblower may lead to the closure of the process. Whistleblowers who are concerned about possible retaliation or reprisals if their identity is revealed should make this clear when making the report so that appropriate measures can be taken to protect their identity as far as possible.

3. Managing Whistleblowing Concerns

The Policy Administrators shall determine whom amongst themselves and their departments, or other designee within PII, is appropriate to manage reports of Whistleblowing Concerns. For example:

- the PII Head of Counter Fraud shall manage reports of Whistleblowing Concerns relating to fraud, corruption, bribery or other financial impropriety; and
- the PII Director of HR shall manage reports of Whistleblowing Concerns relating to workplace misconduct as between Staff and Volunteers, including harassment, bullying or discrimination other than sexual harassment, exploitation or abuse;
- the PII Director of Safeguarding of Children and Young People shall manage reports of Whistleblowing Concerns related to a child or youth safeguarding issue (pursuant to the reporting procedures detailed in the Global Policy on Safeguarding Children and Young People and 'Reporting and Responding to Safeguarding Issues' global document); or relating to sexual harassment, exploitation and abuse as between Staff and Volunteers.

The Chair of the Members' Assembly and International Board shall manage reports of Whistleblowing Concerns related to any subject matter that involves the Chief Executive Officer ("CEO") or any member of the International Board, with delegation to appropriate staff as necessary.

The Chair of the Audit and Compliance Committee of the Members' Assembly shall manage reports of Whistleblowing Concerns related to any subject matter that involves the Chair of the Members' Assembly and International Board, with delegation to appropriate staff as necessary.

In cases where there are multiple allegations against different people in one Whistleblower Concern, the Policy Administrators will collaborate to determine the most effective way forward. The designated Policy Administrator shall always be completely independent from the allegations made. For example, any allegations relating to fraudulent behaviour by the Head of Counter Fraud, shall be managed by someone outside of the Counter Fraud Unit. In case of any doubt, the matter shall be referred to the General Counsel for determination.

Initial Assessment

As an initial step, the relevant Policy Administrator(s) shall decide by conducting an initial assessment, whether or not the reported Whistleblowing Concern should be investigated. A decision not to investigate may be made at the discretion of the Policy Administrator which may include cases where (i) insufficient information is provided by the Whistleblower; (ii) the allegations do not fall under the definition of Whistleblowing; (iii) the same issues have been raised previously and found to be unsubstantiated; or (iv) the issue is referred to another body (such as management or the board of another Plan International entity, who may decide to investigate itself).

Investigation

Once a decision is made to investigate a reported Whistleblowing Concern, the Policy Administrator may delegate the responsibility to one or more appropriate members of Staff or to any other individual, including persons not employed by PII. In cases involving the CEO or an International Board member which the Policy Administrator has decided to investigate, an external investigator, reporting to the appropriate Policy Administrator, should generally be used.

Whistleblowers who are not anonymous may request to be accompanied at any meetings in respect of the Whistleblowing Concern by a colleague of the Whistleblower's selection or if locally applicable by an appropriate trade union or employee representative. The Whistleblower may be requested to select an alternative colleague if the one identified is deemed not to be a reasonable choice by the Policy Administrator.

Where appropriate and subject to the need for confidentiality, the Whistleblower should be kept informed of the progress of the investigation. In circumstances where the Whistleblower is anonymous, it is generally not appropriate to provide details beyond the fact that an investigation has started or has been completed.

If an initial assessment or an investigation concludes that a Whistleblower has maliciously or knowingly made false allegations, the Whistleblower may be subject to disciplinary action, up to and including termination of employment.

4. Protection and Support for Whistleblowers

PII is committed to protecting members of Staff and Volunteers who make disclosures under this Policy.

Any member of Staff or Volunteers who retaliates against a Whistleblower or in any way causes a Whistleblower to suffer adverse employment consequences as a result of their report is subject to discipline up to and including termination of employment. Retaliation and adverse employment consequences may include, for example, intimidation, bullying, harassment and discrimination, failure to promote, adverse impact on compensation or benefits, termination, suspension, demotion, or other change in responsibilities whether formal or informal.

Staff and Volunteers who believe they have suffered retaliation or adverse employment consequences as a result of having reported a Whistleblowing Concern should inform the appropriate Policy Administrator and are encouraged to refer to the PII Harassment, Bullying and Discrimination Policy.³

TERMS AND DEFINITIONS

When used in this document:

"Director" is an Executive Director of PII or a Country Director or Regional Director and Sub-Regional Director.

"Manager" refers to a Staff member who has responsibility for line managing or supervising the work of Staff or Volunteers.

"PII" refers to Plan International, Inc. ("PII"), including its headquarters in the United Kingdom (operating through its UK subsidiary, Plan Limited), and all of its country offices, regional offices, liaison offices, and any other offices, some of which operate as branches and some as subsidiaries. Also referred to in this document as "we" or "us".

"Policy Administrators" means the PII Head of Counter Fraud and the PII Director of Safeguarding, and the PII Director of HR. Each of these individuals shall administer the Policy so far as it relates to a Whistleblowing Concern that falls within their functional remit. With respect to Whistleblowing Concerns alleging wrongdoing by:

³ PII's Harassment, Bullying and Discrimination Policy can be found at: https://planet.planapps.org/Operations/HR0D/Global_Policies/layouts/15/WopiFrame2.aspx?sourcedoc=/Operations/HR0D/Global_Policies/Documents/Harrassment%20Bullying%20Discrimination%20Policy.pdf&action=default

- a. the Chief Executive Officer and/or any member of the International Board other than the Chair, the Chair of the Members' Assembly and International Board shall act as the Policy Administrator; and
- b. the Chair of the Members' Assembly, the Chair of the Audit and Compliance Committee of the Members' Assembly shall act as the Policy Administrator.

"Volunteer" refers to a range of non-paid individuals who have committed to work with or support PII, or who are otherwise affiliated with PII such that they could objectively be seen as a representative of the organisation. It includes, among others, board members, volunteers (including community volunteers), and interns.

"Whistleblowing" is the disclosure of information which relates to potential or suspected . wrongdoing by PII Staff or Volunteers or PII's partners or contractors which is related to their work. This may include (but is not limited to) the following unethical and/or illegal conduct or activity, irregularities, wrongdoing or dangers:

- a. Deliberate disregard or breach of our internal policies and procedures, including (but not limited to) the:
 - i. PII Code of Conduct;
 - ii. Global Policy on Anti-Fraud, Anti-Bribery and Corruption;
 - iii. Global Policy on Safeguarding Children and Young People;
 - iv. Global Policy on Gender and Inclusion; and
 - v. PII Harassment, Bullying and Discrimination Policy;
- b. Criminal offences or breach of civil law or regulations;
- c. Endangerment of the health or safety of any person; or
- d. The deliberate concealment of any of the above.

A **"Whistleblower"** is a member of Staff or Volunteer who raises a genuine concern relating to any of the above (each a **"Whistleblowing Concern"**) that they reasonably believe to be true.

"Staff" refers to individuals whose relationship with PII is governed by an employment contract.