

WHISTLEBLOWING POLICY

Prime Expertise Limited

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EFFECTIVE DATE	March 2022	DATE OF LAST REVISION	March 2023	VERSION NO.	1.0.2
APPLIES TO					
GROUP 1	Associates	GROUP 2	Employees	GROUP 3	Interns
GROUP 4	—	GROUP 5	—	GROUP 6	—

VERSION HISTORY				
VERSION	APPROVED BY	REVISION DATE	DESCRIPTION OF CHANGE	RESPONSIBILITY
1.0.1	Board of Directors	N/A	N/A	Managing Director
1.0.2	Board of Directors	March 2023	Annual review to address any gaps or inconsistencies	Managing Director

Purpose

In order to operate in an ethical, responsible, and legal manner, Prime Expertise views whistleblowing as a positive act that can make a valuable contribution. At Prime Expertise, we aim to achieve the highest possible standards of service and the highest possible ethical standards in public life and in all of our practices. Thus, we encourage our associates, employees, and interns who have any serious concerns about any aspect of our business conduct or service provision to come forward and voice those concerns.

This Policy is designed to ensure that an associate, employee, or intern can raise his or her concerns about wrongdoing or malpractice within Prime Expertise without fear of victimization, subsequent discrimination, disadvantage, or dismissal. It is also intended to encourage and enable an associate, employee, or intern to raise serious concerns within Prime Expertise rather than ignore a problem or "blow the whistle" outside.

Generally, the purpose of this Policy is to:

- Encourage an associate, employee, or intern to feel confident in raising serious concerns at the earliest opportunity and to question and act upon concerns about practice;
- Provide avenues for an associate, employee, or intern to raise those concerns and receive feedback on any action taken;
- Ensure that an associate, employee, or intern receives a response to his or her concerns and that he or she is aware of how to pursue them if he or she is not satisfied; and
- Assure an associate, employee, or intern that he or she will be protected from possible reprisals or victimization if he or she has made any disclosure in good faith.

Scope

Prime Expertise's Whistleblowing Policy applies to all those who work for Prime Expertise across Tanzania, East Africa, and beyond, whether full-time or part-time, temporary or permanent. This includes:

- associates;

- employees; and
- interns.

The term "Prime Expertise personnel or personnel" is used throughout this Policy to cover all associates, employees, and interns.

Protecting the Whistleblower

Your legal rights

This Policy has been written to take account of the Tanzania Employment and Labour Relations Act 2004 and the Whistleblower and Witness Protection Act 2015 (hereafter "the Acts"), which protect workers who make disclosures about certain matters of concern when those disclosures are made in accordance with the Acts' provisions and in the public interest.

The Acts make it unlawful for Prime Expertise to dismiss anyone or allow them to be victimized on the basis that they have made an appropriate, lawful disclosure in accordance with the Acts.

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

Harassment or victimization

Prime Expertise is committed to good practice and high standards, as well as supporting you as our personnel.

Prime Expertise recognises that the decision to report a concern can be a difficult one to make. If personnel honestly and reasonably believe what he or she says is true, he or she should have nothing to fear because he or she will be doing his or her duty to his or her employer, colleagues, and those for whom he or she is providing a service.

Prime Expertise will not tolerate any harassment or victimization of a Whistleblower (including informal pressures) and will take appropriate action to protect you when you raise a concern in good faith. We will treat this as a serious disciplinary offense, which will be dealt with under the disciplinary rules and procedures.

Support to you

Throughout this process:

- you will receive full support from senior management;
- your concerns will be taken seriously; and
- Prime Expertise will do all it can to help you throughout the investigation.

If appropriate, the Company will consider temporarily redeploying you for the period of the investigation.

For those who are Prime Expertise's personnel, 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

This Policy encourages you to put your name to your allegation whenever possible. If you do not tell us who you are, it will be much more difficult for us to protect your position or to give you feedback. This Policy is not ideally suited to concerns raised anonymously.

Concerns expressed anonymously are much less powerful, but they may be considered at the discretion of the Company. In exercising this discretion, the factors to be taken into account would include:

- the seriousness of the issue raised;
- the credibility of the concern; and
- the likelihood of confirming the allegation from other sources.

Untrue allegations

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

Raising a concern

If you have a genuine concern and have a reasonable belief that it is in the public interest, even if it is later discovered that you are mistaken, under this Policy you will not be at risk of losing your contract, job, or suffering any form of retribution as a result. If you genuinely believe that the actions of someone who works for Prime Expertise could lead to or have resulted in malpractice, please follow the procedure below.

You should decide who is most appropriate to raise your concerns with. This could be your line manager, supervisor, or the Managing Director. You can raise their concern by telephone, in person, or in writing and should provide the following information:

- Whether anyone is in immediate danger;
- The nature of the concern and why you believe it to be true;
- How you first became aware of the problem;
- The background and history of the concern, giving relevant dates, times, and places of any further instances;
- If applicable, please indicate who you have already spoken to about the issue and whether any action has been taken as a result.

Although you are not expected to prove beyond a reasonable 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 and that there are reasonable grounds for 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 similar concerns.

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

What action will be taken?

The person who has been contacted will respond to the concerns as quickly as possible. The overriding principle will be the public interest, and initial inquiries 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 strict confidentiality terms, i.e., by not informing the subject of the complaint until (or if) it becomes necessary to do so. In certain cases, however, 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 the 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.

The person who has been contacted must ensure that:

- Reported incidents of theft, fraud, or corruption are sent immediately to the Board of Directors. If an investigation is conducted, the outcome may involve taking disciplinary action if misconduct has been proven, which may include dismissal.
- Safeguarding concerns relating to sexual abuse or exploitation of children, vulnerable adults, and beneficiaries are directly reported to the Managing Director. Prime Expertise's procedures for dealing with and reporting safeguarding reports will then be followed.
- Any other incidents of malpractice in the workplace are also reported to the Managing Director or Chairman of the Board of Directors, wherever necessary.

Within 10 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; and
- advising you whether further investigations will take place and, if not, why not.

The amount of contact between you and the individual considering the issues will depend on the nature of the matters raised, the potential difficulties involved, and the clarity of the information provided. 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 professional association representative or a friend may accompany you in support.

Prime Expertise will do what it can to minimise any difficulties that may be experienced 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.

The Board of Directors will take appropriate action, which may end in dismissal, against any personnel who have been found to be victimizing another individual for using this procedure or deterring them from reporting genuine concerns under it.

How can the situation be escalated?

This Policy is intended to provide you with an avenue within Prime Expertise 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 organization, the following are the company's prescribed contacts:

- The Chairperson of the Board of Directors;
- The police;
- Other relevant bodies prescribed by the legislation i.e. the Tanzania Employment and Labour Relations Act 2004 and the Whistleblower and Witness Protection Act 2015.

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 the Tanzania Employment and Labour Relations Act 2004, the Whistleblower and Witness Protection Act 2015, and this Policy.

You should not disclose information that is confidential to Prime Expertise or to anyone else, such as a client of Prime Expertise, except to those included in the list of prescribed contacts. This Policy does not prevent you from taking your own legal advice.

Recording and monitoring of concerns

The Managing Director will keep a log of all concerns brought to his attention and will produce an annual report for the Board of Directors summarizing the concerns raised and action(s) taken. The report will not include any personnel names. The aim of this will be to ensure that the Company learns from its mistakes and does not repeat them.

Amendments

Please note that this Policy is subject to change from time to time. Any changes to this Policy made in the future will be reflected on the Prime Expertise website.

Relevant legislations

The Whistleblower and Witness Protection Act, 2015, available at:

<http://parliament.go.tz/polis/uploads/bills/1447073069-A%20BILL%20-WHISTLEBLOWERS%20ACT,%20%202015-%20Kabunga.pdf>.

The Tanzania Employment and Labour Relations Act, 2004, available at:

<https://www.ilo.org/dyn/natlex/docs/SERIAL/68319/66452/F437907581/tza68319.pdf>.

Related policy

Safeguarding and Child Protection Policy, available at: <https://primeexpertise.co.tz/wp-content/uploads/2023/04/Safeguarding-Child-Protection-Policy.pdf>.