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2nd September 2022

The Policy Practice's Ethical Policies¹

The Policy Practice Directors, Principals, Associates, employees, subcontractors and their staff are expected in all matters to:

- act responsibly and with integrity, and
- be transparent and accountable.

The Policy Practice's Ethical Policies described in the following sub-sections include:

1. Ethical behaviour
2. Safeguarding
3. Harassment and bullying
4. Anti-slavery and human trafficking
5. Corruption and bribery
6. Conflict of interests
7. Gifts and hospitality
8. Anti Terrorism
9. Whistleblowing

1. Ethical Behaviour

Interactions with citizens, the public sector, civil society organisations and the private sector must meet the highest standards of ethical and professional behaviour. Arrangements and relationships entered into, whether with or on behalf of the Policy Practice, must be free from bias, conflict of interest or the undue influence of others.

Social responsibility and respect for human rights are central to The Policy Practice and its suppliers. The Policy Practice is committed to procedures that eliminate the risk of poor human rights practices within its delivery chains. These include sexual exploitation, abuse and harassment; all forms of child abuse; inequality or discrimination on the basis of race, gender, age, religion, sexuality, culture or disability; unethical and illegal employment practices, such as modern-day slavery, forced and child labour and other forms of exploitative and unethical treatment of workers and aid recipients. The Policy Practice will expect a particular emphasis on management of these issues in high risk fragile and conflict affected states, with a focus on ensuring remedy and redress if things go wrong.

¹ Relevant definitions can be found in the FCDO standard Terms and conditions: <https://www.gov.uk/government/organisations/department-for-international-development/about/procurement#dfid-terms-and-conditions-of-contract>

We encourage practices in line with the International Labour Organisation (ILO) Convention 138² and the Ethical Trading Initiative (ETI) Base Code³ throughout our delivery chain.

2. Safeguarding policy

Statement

Women, children, the very poor, people with disabilities, indigenous groups, migrant workers and older people are among the most vulnerable. Safeguarding is defined as the actions taken to protect and promote the welfare of children and vulnerable adults enabling them to live free from harm, abuse and neglect.

The Policy Practice takes a zero-tolerance stand on exploitative and abusive relationships and takes reasonable measures to eliminate or minimise the risks of actual, attempted or threatened exploitation, abuse or harassment. The Company expects all Policy Practice Directors, Principals, Associates, employees, subcontractors and their staff to respect The Policy Practice's safeguarding policy. The Company will not tolerate the following behaviour:

- Engaging in sexual relations with anyone under the age of 18 or vulnerable adults, or abuse or exploit a child in any way, regardless of local custom.⁴
- Engaging in "transactional sex" which shall include but not be limited to the exchange of money, employment, goods, or services for sex and such reference to sex shall include sexual favours or any form of humiliating, degrading or exploitative behaviour.
- Emotionally or physically harming a child or vulnerable adult.
- Exchanging money, employment, goods, services or preferential treatment for sexual favours.
- Behaving in a way that is, or appears to be, threatening to the security of ourselves or others.
- Concealing behaviour of others when it is known or thought to be known as a breach to this or other Policy Practice policies, and that puts others in harm or danger.
- Engaging in inappropriate communication with children or vulnerable adults of a sexual or intimate nature.
- Not ensure that another adult is present when working in the proximity of children; not sleep close to unsupervised children; not invite children in hotels or private residence (unless for their immediate protection from injury or physical danger); not physically punish children; not hire children for domestic or other labour.
- Taking pictures of children or vulnerable persons without their informed consent and that of the parents or guardians of the child, explaining how the pictures will be used, how to remove them from the Policy Practice website and ensuring they do not show children in submissive or sexually suggestive manner.

² http://ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C138

³ <http://www.ethicaltrade.org/eti-base-code>

⁴ **Sexual Abuse** means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions, and all sexual activity with someone under the age of 18, regardless of local age of majority or consent under the laws of the territory in which it takes place and regardless of any mistaken belief (by the relevant individual) as to the age of a child. **Sexual Exploitation** means any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes. Includes profiting monetarily, socially, or politically from sexual exploitation of another. **Sexual Harassment** means unwelcome sexual advances (also but not exclusively without touching). It includes requests for sexual favours, or other verbal or physical behaviour of a sexual nature, which may create a hostile or offensive environment.

The Policy Practice pledges to:

- Ensure that its Directors, Principals, Associates, employees, subcontractors and their staff are aware of and comply with The Policy Practice's safeguarding and other policies.
- Ensure that everyone covered by this policy is aware of and understand the need to report to the Policy Practice Directors any observed acts of human rights abuse, modern slavery, human trafficking, sexual exploitation; violence, abuse, mistreatment, neglect or exploitation of children.
- Respect the applicable international and national laws, legislation, codes of practice and government guidance regarding the protection of children and vulnerable adults including: the UK Children Act (1989 and 2004), United Nations Convention on the Rights of the Child (1989), and the UK Equality Act (2010), the national laws of the organisations contracting The Policy Practice and of the territories where services are performed.
- Investigate and report on all allegations of sexual abuse and exploitation.

The Policy Practice expects its Directors, Principals, Associates, employees, subcontractors and their staff to pledge to:

- Be accountable for all actions and not to use unequal power relationships for personal gain.
- Be prepared to be trained to spot the signs of sexual misconduct, and not afraid to speak up about their suspicions.
- Not engage personnel or providers whose previous record or conduct known to the supplier (or reasonably ought to be known by a diligent supplier which undertakes the appropriate checks) indicates that they are unsuitable to perform the services and/or where they represent an increased and unacceptable risk of committing serious misconduct.
- Notify The Policy Practice of any allegations, charges and if found guilty of any criminal charges prior to employment or sub-contracting or during employment or sub-contracting with The Policy Practice, including those related to child exploitation and labour.
- Accept to be vetted by the UK Disclosure and Barring Service in respect of any regulated activity performed (as defined by the Safeguarding Vulnerable Groups Act 2006 (as amended)) and/or vetting by a local equivalent service, and be willing to be subject to police checks or additional vetting when required by clients or when deemed necessary by Company Directors due to a potential enhanced risk.
- Not appear on the Home Office Proscribed Terrorist Organisations List.
- Report to the relevant authorities and Policy Practice Directors, any issues and concerns that may arise, that you feel could affect the safety of those we work with and for.

Procedures

If anyone has a concern regarding any of the points above, The Policy Practice strongly encourages them to come forward and raise this, both with The Policy Practice Executive Director responsible for safeguarding, and with the relevant authorities. As a business, The Policy Practice is committed to upholding these principles and standards.

Directors, Principals, Associates, employees, subcontractors and their staff working on UK FCDO contracts will be made aware that they can immediately report all suspicions or allegations of aid diversion, fraud, money laundering or counter terrorism finance to the Counter Fraud and Whistleblowing Unit at reportingconcerns@fcdo.gov.uk or on +44(0)1355 843551, and where necessary, the Appropriate Authorities. This includes any complaints, concerns and incidents regarding serious misconduct or any attempted or threatened serious misconduct by any other supplier personnel or providers to FCDO.

3. Harassment and Bullying Policy

Statement

The Policy Practice recognises that all employees have a right to work in an environment in which the dignity of individuals is respected, and which is free from harassment and bullying. It is committed to eliminating intimidation in any form. This policy applies to harassment on the grounds of disability, gender, marital status, sexual orientation, age, creed, colour, race or ethnic origin.

Harassment breaches Company Policy as outlined and it is classified as a serious offence which may result in disciplinary action including summary dismissal under the Disciplinary Procedure.

Definitions

Harassment is generally described as unwanted conduct which affects the dignity of women or men at work; it encompasses unwelcome physical, verbal or non-verbal behaviour which denigrates or ridicules or is intimidatory. The essential characteristic of harassment is that the action(s) is unwanted by the recipient. The following interpretations and examples of harassment may be helpful in determining whether harassment has taken place.

General Harassment

Harassment can take many forms and may be directed in particular against women and ethnic minorities or towards people because of their age, disability, gender / gender reassignment, marriage / civil partnership, pregnancy / maternity, race, religion or belief, sex, or sexual orientation. It may involve action, behaviour, comment or physical contact which is found objectionable or which causes offence; it can result in the recipient feeling threatened, humiliated or patronised and it can create an intimidating work environment.

Sexual Harassment

Sexual harassment can be defined as an uninvited, unreciprocated and unwelcome behaviour of a sexual nature which is offensive to the person involved and causes that person to feel threatened, humiliated or embarrassed. Examples of sexual harassment are:

- requests for sexual favours, including implied or overt promises of preferential treatment or threats concerning present or future employment status;
- offensive gestures or comments;
- sexually-orientated jibes, innuendo or jokes;
- unwanted physical contact;
- the display of sexually offensive visual material such as calendars, photographs, books or videos.

Sexual harassment may be experienced by men or women as a result of the conduct of men or women. It applies equally regardless of grade or level of job and may also occur when dealing with external clients and/or members of the public.

Racial or Sectarian Harassment

In the workplace, racial or sectarian harassment may take the form of actual or threatened physical abuse or it may involve offensive jokes, verbal abuse, language, graffiti or literature of a racist or sectarian nature, or offensive remarks about a person's skin colour, physical characteristics or religion. It may also include repeated exclusion of a person from an ethnic or religious minority from conversations, patronising remarks, unfair allocation of work or pressure about the speed and/or quality of their work in a way which differs from the treatment of other employees.

Bullying

Bullying is the intimidation or belittling of someone through the misuse of power or position which leaves the recipient feeling hurt, upset, vulnerable or helpless. It is often inextricably linked to the

areas of harassment described above. Bullying is most evident as a pattern of repeat behaviour rather than a one-off event. The following are examples of bullying:

- Unjustified criticism of an individual's personal or professional performance, shouting at an individual, criticising an individual in front of others.
- Spreading malicious rumours or making malicious allegations.
- Unnecessarily aggressive language or shouting.
- Intimidation or ridicule of individuals with disabilities and /or learning difficulties.
- Ignoring or excluding an individual from the team / group.

Responsibilities

All Policy Practice Directors, Principals, Associates, employees, subcontractors and their staff working on client-funded projects or internal Company initiatives have a personal responsibility **NOT** to harass or bully other individuals during the course of their work.

All Directors, Principals, Associates, employees, subcontractors and their staff have an obligation to prevent harassment / bullying and to take immediate action once it has been identified, whether or not a complaint has been made.

Procedures

Allegations of harassment or bullying must be reported to an Executive Director who will ensure that cases are dealt with promptly and sensitively.

Any individual who feels that she or he is being subjected to harassment or bullying by a Policy Practice Director, Principal, Associate, employee, sub-contractor or their staff may attempt to resolve the matter informally in the first instance. In some cases, it may be possible and sufficient for her/him to explain clearly to the person(s) engaged in the unwanted activities that the behaviour is unwelcome, that it offends or makes her/him uncomfortable.

- If, at the initial informal discussion stage, the circumstances are too difficult or embarrassing to approach the harasser alone, the complainant may wish to be accompanied by a friend or colleague;
- the complainant may wish to write a letter to the harasser (research has shown this to be very effective);
- the complainant should keep a record of any incidents, detailing when, where, what occurred, and witnesses (if any);
- in some cases, victims of harassment or bullying may not be sufficiently confident to tell the harasser that her or his behaviour is unacceptable. The Policy Practice emphasises therefore that complainants **are not required** to approach the harasser in an attempt to resolve the problem informally, and are entitled to report the matter immediately if they so wish.

Where the steps outlined above are unsuccessful or inappropriate, the complainant should raise the matter informally and in confidence with her/his project manager or an Executive Director. This should be the choice of complainant depending on who she/he feels most comfortable raising the matter with.

Project managers must report any cases of bullying or harassment raised with them to an Executive Director within **three working days**.

The Executive Directors will usually deal with the complaint collectively, but may appoint a sub-team or two directors depending on availability or sensitivities surrounding the case.

The Executive Directors will discuss the matter with the complainant and agree a course of action. The complainant may be accompanied by a representative or work colleague at these meetings. The

alleged harasser will also have the right to state their version of events and also be accompanied by a representative or colleague.

The complainant must be assured that she/he will not be discriminated against or victimised for raising the complaint. Confidentiality will be observed throughout and the need for any disclosure of the details of the case will be discussed and agreed.

At any stage of the process the Executive Directors can decide to draw on an independent person before deciding on the best course of action.

The Executive Directors will maintain a complete record of the case, including relevant emails, notes on discussions with affected parties, as well as written communications.

The Executive Directors will undertake a full hearing of the facts surrounding the case, taking account of the views of the complainant and alleged harasser. Where there is evidence that harassment has occurred, prompt and corrective action will be taken, including disciplinary action where appropriate. Depending on the circumstances, seriousness of the case and previous measures taken, this may include:

- Attempts to mediate between affected parties.
- Agreement between affected parties to avoid interaction likely to result in repeat incidents of bullying and harassment.
- Opportunity for harasser and victim to undergo appropriate training or counselling.
- Written warning to the harasser.
- Dismissal or instruction to leave The Policy Practice in most serious cases of repeated harassment or bullying where a previous written warning has not been heeded.

If a complainant or accused harasser are not satisfied with the measures taken to resolve the case, they may make a complaint through the Company's grievance procedure.

Communication and training

All Policy Practice Directors, Principals, Associates, employees, sub-contractors and their staff will be informed of the Harassment and Bullying Policy and Procedure. They must be re-assured regarding:

- Fear that others will consider the behaviour trivial and not take complaints of harassment seriously.
- Fear that no action will be taken against a person guilty of harassment.
- Fear of disc or victimisation in registering a complaint either informally or formally through the Grievance Procedure.

The Harassment and Bullying Policy will be part of the induction of Directors, Principals, Associates and employees of The Policy Practice, and included in contracts for sub-contractors and their staff.

Company Directors and others responsible for implementing this policy will be offered training on dealing with cases of bullying and harassment and following the procedures set out in this policy

Monitoring and review

The effectiveness of this policy will be reviewed regularly. One named Director will have responsibility for ensuring that this policy is followed and updated as needed. This Director will assess the effectiveness of the policy and its procedures and maintain documents and statistics in respect of the complaints of harassment. Strict confidentiality will be maintained, and the monitoring process will comply with the Data Protection Act.

4. Anti-Slavery and Human Trafficking Policy

Statement

Modern slavery includes human trafficking and forced labour, which are severe violations of human rights. Forced labour includes unfair treatment and unfair employment of a worker in order to benefit from their work.

The Policy Practice is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. The Company's policies reflect its commitment to acting ethically and with integrity in all business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in the Company's supply chains.

Procedures

Where possible the Company builds long standing relationships with suppliers and makes clear our expectations of business behaviour. The Company's Recruitment Policy and Procurement Policy both contain due diligence procedures to establish the credentials of potential employees and sub-contractors.

In particular, these policies require that all staff in the UK are legally permitted to work in the UK and are in possession of their own bank accounts. The Company ensures that overseas suppliers of services are aware of the Company's anti-slavery policy and commit to being compliant to this and other ethical policies.

5. Corruption, Fraud and Bribery policy

Statement

The Company has a zero-tolerance policy towards fraud, bribery and corruption. It is committed to acting fairly and with integrity in all of its business dealings and relationships and implementing and enforcing effective systems to counter corruption and bribery.

All Policy Practice Directors, Principals, Associates, employees, subcontractors and their staff are required to:

- Comply with the UK Anti-Bribery Act 2010 and any other anti-bribery and anti-corruption legislation that applies in any jurisdiction in any part of the world in which they might be expected to conduct business.
- Act honestly, responsibly and with integrity.
- Safeguard and uphold the Company's core values by operating in an ethical, professional and lawful manner at all times.
- Be vigilant of fraudulent behaviour, and to question any suspicious activity

Bribes are judged by UK standards regardless of where a bribe takes place. Bribery is not always obvious and does not always involve cash.

There are four bribery offences for individuals and organisations under the Bribery Act:

1. Offering a bribe.
2. Accepting a bribe.
3. Bribery of a foreign public official.
4. Failure by an organisation to prevent bribery.

It is also an offence in the UK for an employee or an associated person to bribe another person in the course of doing business intending either to obtain or retain business, or to obtain or retain an advantage in the conduct of business, for the Company. The Company can be liable for this offence where it has failed to prevent such bribery by associated persons. As well as an unlimited fine, it could suffer substantial reputational damage.

Procedures

Policy Practice Directors, Principals, Associates, employees, subcontractors and their staff shall immediately and without undue delay inform the designated Policy Practice Director of any event that interferes or threatens to materially interfere with the successful delivery of the services, including credible suspicion of/or actual fraud, bribery, corruption or any other financial irregularity or impropriety. All suspicions will be treated with the utmost confidentiality.

In addition, as set out in the Company's Conflict of Interest policy, Policy Practice Directors, Principals, Associates, employees, subcontractors and their staff should declare any gifts or hospitality received that may be perceived as attempts to corruptly influence them in their role in the Company.

It is not acceptable to give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given, or to accept a payment, gift or hospitality from a third party that is offered or provided with the expectation that it will obtain a business advantage for them.

Any payment or gift to a public official or other person to secure or accelerate the prompt or proper performance of a routine government procedure or process, otherwise known as a "facilitation payment", is also strictly prohibited. Facilitation payments are not commonly paid in the UK, but they are common in some other jurisdictions.

In this context, all gifts and hospitality should be declared if the person or organisation offering the gifts or hospitality might be reasonably perceived to be seeking to influence the recipient. More detailed guidance on how to reject bribes can be found here:

<http://www.transparency.org/publications/publications/resist>

The Policy Practice recognises that circumstance may arise where people associated with the Company feel their personal safety to be at severe risk if they refuse to bribe or be bribed, and therefore that they have no alternative but to make or receive a payment. In these circumstances the incident must be reported at the earliest available opportunity. But in all other circumstances bribes must not be offered or accepted.

Confidential guidance can be provided at any time by contacting any Director. Potential conflicts of interest must be reported using the procedure described in the Company's Conflict of Interest policy.

All incidents must immediately be disclosed to the Company, including any knowledge or suspicion any employee or associated person, has plans to offer, promise or give a bribe or to request, agree to receive or accept a bribe in connection with the business of the Company. The Company will keep a record of all disclosures.

The Company also maintains a confidential whistleblowing email address that is routed directly to the responsible Director (whistleblowing@thepolicypractice.com).

6. Conflict of Interest policy

Statement

Conflicts of Interest cover three potential areas of concern:

- Conflicts of interest between Directors, Principals, Associates, employees, subcontractors and their staff vis-à-vis the Shareholders.
- Conflicts of interest arising where Directors, Principals, Associates, employees, subcontractors and their staff undertake work for competitor companies.
- Conflicts of interest between Directors, Principals, Associates, employees, subcontractors and their staff vis-à-vis clients, such as FCDO.

Policy Practice Directors, Principals, Associates, employees, subcontractors and their staff have an obligation to act in the best interests of shareholders and clients, and in accordance with the Company's memorandum and articles of association. Conflicts of interests may arise where an individual's personal or family interests and/or loyalties conflict with those of the shareholders or a client such as FCDO.

Procedures

The aim of this policy is to protect both the organisation and the individuals involved from any appearance of impropriety.

The declaration of interests

Accordingly, Directors are asked to declare potential conflicts of interests prior to their appointment and at each Annual General Meeting. To be effective, the declaration of interests needs to be updated at least annually, and also when any changes occur.

Directors are not required to work exclusively for The Policy Practice. It is part of their contract of employment to inform each other if they feel that their work for competitors might present a conflict of interest with The Policy Practice.

In addition, Directors, Principals, Associates, employees, subcontractors and their staff should declare any conflicts of interest related to projects and to declare any gifts or hospitality received (see below) in connection with their role in the Company as they arise. A declaration of interests form and a gift/hospitality form is available from the Directors.

If you are not sure what to declare, or whether/when your declaration needs to be updated, please err on the side of caution. If you would like to discuss this issue, please contact a Director for confidential guidance. Interests will be recorded on the Company's register of interests, which will be maintained by the Company's Business Manager. The register will be accessible by Directors and Shareholders on request to the Directors.

Managing contracts

If you have a conflict of interest, you must not be involved in managing or monitoring a contract in which you have an interest.

What to do if you face a conflict of interest

You should declare your interest at the earliest opportunity and withdraw from any subsequent discussion. The same applies if you face a conflict for any other reason. You may, however, participate

in discussions from which you may indirectly benefit, for example where the benefits are universal to all users, or where your benefit is minimal.

If you fail to declare an interest that is known to the Directors, they will declare that interest.

Decisions taken where a Director or member of staff has an interest

In the event of the Directors or Principals having to decide upon a question in which a Director or Principal has an interest at the level of management meetings, all decisions will be made by vote, with a simple majority required. A quorum of two Directors must be present for the discussion and decision; interested parties will not be counted when deciding whether the meeting is quorate.

Interested Directors and Principals may not vote on matters affecting their own interests. They may participate in the discussion but not the decision-making process. Independent external moderation will be used where conflicts cannot be resolved through the usual procedures through an Extraordinary General Meeting or Annual General Meeting.

All decisions under a conflict of interest will be recorded by the Business Manager and reported in the minutes of the meeting. The report will record:

- The nature and extent of the conflict.
- An outline of the discussion.
- The actions taken to manage the conflict.

Data Protection

The information provided will be processed in accordance with data protection principles as set out in the relevant Data Protection legislation and relevant Company policy. The information shall not be used for any other purpose than protecting the Company and client from conflicts of interest.

Previous HMG employment

If The Policy Practice proposes to recruit an employee, Principal or Associate, or sub-contract a consultant (directly or as part of the delivery chain) who was employed by FCDO or the Crown in the preceding two years, HMG Business Appointment Rules will be followed, including Conflict of Interest declarations.

7. Gifts and Hospitality policy

Statement

Policy Practice Directors, Principals, Associates, employees and subcontractors and their staff should avoid accepting gifts and hospitality as part of their work, especially where this creates an impression of impropriety. However, it is recognised that in some situations refusing to accept a gift can create embarrassment and damage working relationships. Policy Practice Directors, Principals, Associates, employees, subcontractors and their staff are expected to exercise personal judgement in accepting gifts and offers of hospitality and should discuss situations of doubt with an Executive Director.

Procedures

Small gifts and offers of hospitality of a value of less than £25 on one individual occasion and less than £50 in one calendar year can be accepted and need not be declared. Policy Practice Directors, Principals, Associates, employees, subcontractors and their staff should generally avoid accepting larger gifts and offers of hospitality, but may in exceptional circumstances accept such offers where this is wherever possible discussed in advance with an Executive Director and is in all circumstances declared in the Company's register of interests maintained by the Business Manager.

8. Anti Terrorism policy

Statement

The Policy Practice asserts that to the best of its knowledge the Company:

- does not provide funding, including through financial assets or economic resources, either directly or indirectly to or for the benefit of persons, groups or entities listed in accordance with European Council Regulation EC/2580/2001 (as amended) and/or the Terrorism (United Nations Measures) Orders 2009 of the United Kingdom, or contravene the provisions of those and any subsequent applicable terrorism legislation;
- nor has the Company any personnel, servants, agents or subcontractors, or any person acting on their behalf appeared at any time on the UK Home Office Proscribed Terrorist Organisations List;
- nor to the best of its knowledge does the Company have any personnel, servants, agents or subcontractors, or any person acting on their behalf committed any offence under the Terrorism Act 2000 or any other laws.

Procedures

Should The Policy Practice become aware or has reason to believe that its Directors, Principals, Associates, employees, subcontractors and their staff, or any person acting on their behalf, has been subject to an investigation or prosecution which relates to an alleged infringement of anti-terrorism legislation, it will notify the relevant authorities immediately.

The Policy Practice will terminate with immediate effect by written notice any contracts with suppliers who commit an offence under the UK Terrorism Act 2000 and will seek to recover any resulting losses in accordance with those contract terms.

The Company's Recruitment Policy and Procurement Policy both contain due diligence procedures to establish the credentials of potential employees and sub-contractors.

9. Whistleblowing policy

Statement

A whistleblower is any person associated with The Policy Practice who reports certain types of wrongdoing, usually something seen at work. The Policy Practice is committed to treating whistleblowers fairly and they will not lose their employment or contractual benefits because they 'blow the whistle'. Concerns can be expressed at any time about an incident that happened in the past, is happening now, or is expected to occur in the near future.

Whistleblowers are protected by law if they report any of the following:

- a criminal offence, for example fraud;
- someone's health and safety is in danger;
- risk or actual damage to the environment;
- a miscarriage of justice;
- the Company is breaking the law, for example does not have the right insurance;
- it is believed someone is covering up wrongdoing.

Complaints that are not covered by the whistleblowing policy include personal grievances (for example bullying, harassment, discrimination) that are not covered by whistleblowing law, unless the

particular case is in the public interest. Grievances should be reported as described in the Company's Harassment and Bullying Policy, and/or using the Company's Grievance Procedure.

Whistleblowers can give their name but request confidentiality. The Policy Practice is committed to treat all disclosures consistently and fairly and will make every effort to protect the identity of the whistleblower (unless required by law to break that confidentiality). The Company makes a commitment that whistleblowers will not be victimised. Any instances of victimisation will be taken seriously and managed appropriately. So-called 'gagging clauses' in settlement agreements will not be used by the Company to prevent whistleblowers making disclosures in the public interest.

Procedure

Policy Practice Directors, Principals, Associates, employees, subcontractors and their staff must immediately report to their Project Manager or the Executive Director of the Company responsible for ethical behaviour and safeguarding: (a) all suspicions or allegations of aid diversion, fraud, money laundering or counter terrorism finance, or (b) any suspected violations of the Company's safeguarding policy, including suspected misconduct, illegal acts or failures to investigate actual attempted or threatened sexual exploitation or abuse.

To disclose a concern, the whistleblower should contact any Executive Director or the Business Manager by telephone, in writing to the Company address, or through the whistleblower e-mail address: whistleblowing@thepolicypractice.com.

The responsible Executive Director will convene a review panel, the evidence will be reviewed, where necessary legal advice sought, and a course of action proposed. This will be communicated to the whistleblower in writing within a reasonable time.

The Policy Practice will keep a log to track the numbers and details of reported concerns, including organisational safeguarding allegations.

Ethical Policy and Whistleblower Training

Ethical and whistleblowing training will be provided to Policy Practice Directors, Principals, Associates and employees. The Company will ensure appropriate training is provided to the wider delivery chain. Training logs for the Company staff will be maintained and annual declarations made. Training will include: ethical behaviour, confidentiality, respect for colleagues, child or vulnerable adult safeguarding, modern slavery, conflicts of interest, counter-fraud and anti-bribery, equality, diversity and inclusion.

Other relevant policies

In addition to ethical behaviour covered in this policy, Policy Practice Directors, Principals, Associates, employees, subcontractors and their staff are expected to respect the Company's ethical behaviour expectations set out in other policies, including:

- Grievance Procedure
- Recruitment Policy
- Procurement Policy
- Due Diligence Policy
- Financial Governance Policy and Procedures.

Responsible Director: Laure-Hélène Piron

Revision log

Original Draft: 16 March 2019

Revision: 8 July 2019

Revision: 16 September 2019 (combining policies in one document)

Revision: 20 October (following Principals Advisory Group meeting)

Revision: 2 September 2021