

ORANGE TREE FOUNDATION

	WHISTLE BLOWING POLICY				
	Title				
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1. Objective:

The objective of this Policy is to foster an environment where employees, students, and other stakeholders can report unlawful acts, improper conduct, fraud or any other activities which may be contrary to the best interest of OTF or the Public, without any fear for their safety or anonymity.

2. Responsibility:

- a) Board of Directors
- b) CEO

3. Scope:

- 3.1. This policy applies to all employees, including full-time, part-time and contract employees.
- 3.2. It also applies to external stakeholders such as students, donors, suppliers, contractors, bankers, etc., who may have a relationship with OTF.

4. Policy:

- 4.1. OTF is committed to the highest standards of honesty, integrity, transparency and accountability. This Whistleblowing Policy encourages and enables all employees to come forward and voice their concerns within OTF rather than overlooking a problem or 'blowing the whistle' outside.
- 4.2. The Whistleblowing Policy does not apply to employees' career-related issues such as promotions, transfers, relocations, trainings etc., for which a separate procedure exists.
- 4.3. OTF shall ensure that disclosures by Whistleblowers are evaluated and investigated objectively and brought to a logical conclusion.
- 4.4. OTF shall guarantee the anonymity and confidentiality of Whistleblowers to the extent reasonably practicable.
- 4.5. Any individual wishing to report a matter of concern may do so directly via the designated whistleblowing email address: whistleblowing@orangetreefoundation.org which shall be accessed and managed solely by the designated Board member responsible for receiving whistleblowing reports.
- 4.6. Each concern received is to be logged so that will be used in the subsequent investigation and reporting of the concern.

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- 4.7. Designated Board Member shall be responsible for the implementation of this policy and may utilise his fellow Directors and Advisors or the independent auditor in case of any investigation.
- 4.8. The independent auditor shall take steps to minimise any difficulties which a Whistleblower may experience as a result of raising a concern.
- 4.9. The Designated Board Member shall, on June 30 and December 31 of every year, submit to the BOD a list of matters reported by Whistleblowers during the period, together with the outcome of the probe or enquiry conducted therein and comments on the protection of the Whistleblowers.

Prepared by:  Date: _____
 Company Secretary

Reviewed By:  Date: _____
 Chief Executive Officer

Approved By:  Date: _____
 Chairman BoD
