



AGTF
AFRICA GLOBAL
TRADE FINANCE LTD

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I. POLICY STATEMENT

Africa Global Trade Finance Ltd and its subsidiaries hereon in known as “AGTF” is committed to conducting its business with honesty and integrity, and we expect all staff to maintain high standards. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct.

A culture of openness and accountability is essential in order to prevent such situations occurring or to address them when they do occur.

The aims of this policy are:

- a) To encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.
- b) To provide staff with guidance as to how to raise those concerns and who to raise them with
- c) To reassure staff that they should be able to raise genuine concerns in good faith without fear of reprisals, even if they turn out to be mistaken.

This policy takes account of the Whistleblowing Arrangements Code of Practice issued by the British Standards Institute and Public Concern at Work, and also the guidance issued by the Financial Conduct Authority (FCA) and the Bank of England’s Prudential Regulation Authority (PRA) in the FCA Handbook and the PRA Rulebook. Although we are not obliged to implement these rules, we have chosen to adopt them in our organisation as the best way to achieve the aims of this policy.

This policy does not form part of any employee’s contract of employment, and it may be amended at any time.

2. WHO IS COVERED BY THIS POLICY?

This policy applies to all individuals working at all levels of Africa Global Trade Finance Ltd, including subsidiaries, senior managers, officers, directors, employees, consultants, self-employed contractors, trainees, homeworkers, part-time and fixed-term workers, casual and agency staff, volunteers, agents, suppliers, non-executive directors, and former employees (collectively referred to as staff in this policy).

3. WHAT IS WHISTLEBLOWING?

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include the following reportable concerns:

- (a) criminal activity;
- (b) miscarriages of justice;
- (c) danger to health and safety;
- (d) damage to the environment;
- (e) failure to comply with any legal [or professional] obligation or regulatory requirements;
- (f) bribery;
- (g) financial fraud or mismanagement;
- (h) negligence;

- (i) breaches of company policies and procedures;
- (j) behaviour that harms or is likely to harm the reputation or financial well-being of the firm;
- (k) the deliberate concealment of any of the above matters.

A whistleblower is a person who raises a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a whistleblowing concern) you should report it under this policy.

4. WHISTLEBLOWER'S CHAMPION

To ensure the effectiveness of this whistleblowing policy and associated procedures, we have appointed a Whistleblower's Champion. Their role is to ensure and oversee the:

- (a) design and implementation of all procedures designed to implement this policy, including those intended to protect whistleblowers from being victimised;
- (b) delivery of appropriate and sufficient training and awareness of whistleblowing to all staff;
- (c) regular reporting to the Board of Directors of any whistleblowing within the Company and progress on implementation of this policy, including the preparation and submission of an annual report to the board about the Company's whistleblowing systems and controls;
- (d) protection of whistleblowers through the above measures and activities.

The appointed Whistleblowers' Champion will generally be a Director, and we will ensure they have independent legal advice and training available to them in order to carry out their responsibilities.

5. RAISING A WHISTLEBLOWING CONCERN

We hope that in many cases you will be able to raise any concerns with your manager. You may tell them in person or put the matter in writing if you prefer. They may be able to agree a way of resolving your concern quickly and effectively. In some cases, they may refer the matter to the Whistleblowers' Champion, a Company Director or external advisor.

However, where the matter is more serious, or you feel that your manager has not addressed your concern, or you prefer not to raise it with them for any reason, you should contact the Whistleblowers' Champion or a Company Director, details of which are available from your manager

We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

We will take down a written summary of your concern and provide you with a copy after the meeting. We will also aim to give you an indication of how we propose to deal with the matter.

6. CONFIDENTIALITY

We hope that staff will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

We do not encourage staff to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any

allegations are credible and have been made in good faith. Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to the Whistleblowers' Champion or a Senior Manager and appropriate measures can then be taken to preserve confidentiality. If you are in any doubt, you can seek advice from Public Concern at Work, the independent whistleblowing charity, who offer a confidential helpline. Their contact details are at the end of this policy.

7. EXTERNAL DISCLOSURES

The aim of this policy is to provide an internal mechanism for reporting, investigating, and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.

The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. It will very rarely, if ever, be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Public Concern at Work, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. Alternatively, you can contact either the FCA or PRA directly, depending on which authority regulate your activities. Their contact details are at the end of this policy.

Whistleblowing concerns usually relate to the conduct of our staff, but they may sometimes relate to the actions of a third party, such as a customer, supplier, or service provider. The law allows you to raise a concern in good faith with a third party, where you reasonably believe it relates mainly to their actions or something that is legally their responsibility. However, we encourage you to report such concerns internally first. You should contact your manager or the Whistleblowers' Champion for guidance.

8. INVESTIGATION AND OUTCOME

Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment. You may be required to attend additional meetings in order to provide further information.

In some cases, we may appoint an investigator or team of investigators including staff with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.

We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

If we conclude that a whistleblower has made false allegations maliciously, in bad faith or with a view to personal gain, the whistleblower will be subject to disciplinary action.

9. IF YOU ARE NOT SATISFIED

While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy, you can help us to achieve this.

If you are not happy with the way in which your concern has been handled, you can raise it with a Company Director. Alternatively, you may contact the independent whistleblowing charity, Public Concern at Work for further advice. Contact details are set out at the end of this policy.

10. PROTECTION AND SUPPORT FOR WHISTLEBLOWERS

It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support staff who raise genuine concerns in good faith under this policy, even if they turn out to be mistaken.

Staff must not suffer any detrimental treatment as a result of raising a concern in good faith. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform your manager or the Whistleblowers' Champion immediately. If the matter is not remedied, you should raise it formally using our Grievance Procedure.

Staff must not threaten or retaliate against whistleblowers in any way. Anyone involved in such conduct will be subject to disciplinary action.

11. TRAINING AND WIDER COMMUNICATION OF WHISTLEBLOWING RIGHTS

We are committed to providing information, instruction, and training on Whistleblowing for all staff, both when joining the Company and on an ongoing basis.

12. RESPONSIBILITY FOR THE SUCCESS OF THIS POLICY

The Company Directors have overall responsibility for this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.

All staff are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing. Staff are invited to comment on this policy and suggest ways in which it might be improved.

13. CONTACTS

Whistleblowers' Champion – Details available from your manager or a Company Director.

Public Concern at Work (Independent whistleblowing charity)

Helpline: (020) 7404 6609

E-mail: whistle@pcaw.co.uk

Website: www.pcaw.co.uk

Financial Conduct Authority

Call: 020 7066 9200

E-mail: whistle@fca.org.uk

Write to: Intelligence Department (Ref PIDA), Financial Conduct Authority, 25 The North Colonnade, London, E14 5HS