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## **WHISTLE-BLOWER POLICY**

## Introduction

TrustAfrica requires trustees, officers, and staff members to observe the highest ethical standards in the conduct of their duties and responsibilities. As employees and representatives of an organization dedicated to philanthropy, transparency and accountability, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

## Reporting Responsibility

It is the responsibility of all trustees and staff members to maintain high ethical standards, to respect all applicable laws, and to report violations or suspected legal or ethical violations. Examples of potential violations include, but are not limited to:

- Forgery or alteration of documents
- Unauthorized alteration or manipulation of computer files
- Fraudulent financial reporting
- Pursuit of a benefit or advantage in violation of TrustAfrica's Conflict of Interest Policies
- Misappropriation or misuse of TrustAfrica resources, such as funds, supplies, or other assets
- Authorizing or receiving compensation for goods not received or services not performed
- Authorizing or receiving compensation for hours not worked

## No Retaliation

No trustee, officer or employee who in good faith reports a violation of the Conflict of Interest Policies shall suffer harassment, retaliation or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This protection from retaliation is not intended to prohibit supervisors from taking action, including disciplinary action, in the usual scope of their duties and based on valid performance-related factors unrelated to whistle blowing. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within TrustAfrica prior to seeking resolution outside the organization.

## Reporting Violations

TrustAfrica maintains an open door policy and encourages staff members to share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, a staff member's supervisor is in the best position to address an area of concern. However, if you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with anyone in management whom you are comfortable approaching. Supervisors and managers are required to report suspected legal or ethical violations of the Conflict of Interest Policies or of any laws to the Financial Manager, Executive Director or Chair of the Audit Committee, who have responsibility to investigate all reported violations.

For suspected fraud, or when you are not satisfied or uncomfortable with following TrustAfrica's open door policy, individuals should contact the Financial Manager, Executive Director, or Chair of TrustAfrica's Audit Committee directly.

### Compliance Officer

TrustAfrica's Compliance Officer is the Chair of the Audit Committee. The Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning legal and ethical violations and, at his or her discretion, shall advise the Chairperson of the Board of Trustees and/or the members of the Audit Committee. The Compliance Officer has direct access to the Audit Committee of the Board of Trustees and is required to report to the Audit Committee at least annually on compliance activity.

### Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offence.

### Confidentiality

Reports of legal or ethical violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. These reports will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

### Handling of Reported Violations

The Compliance Officer will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.