



Whistleblower Protection Policy

The Jane Goodall Institute Tanzania (JGI-TZ) requires all employees from senior to junior and any parties working for JGI-TZ to observe high standards of business and personal ethical manners in undertaking their duties and responsibilities. As employees and representatives of JGI-TZ, we must practice honesty and integrity in performing our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns and issues internally so that JGI-TZ can address and correct *inappropriate conducts, illegal actions, fraudulent activities, or violation of any published policy of the organization*. Examples of illegal or dishonest activities may include but are not limited to violations of national laws; billing for services not performed or for goods not delivered; and other fraudulent financial reporting. It is the responsibility of all board members, employees and volunteers to report concerns about violations of the organization's code of ethics or suspected violations of law or regulations that govern JGI-TZ's operations.

A whistleblower as defined by this policy is an employee or a stakeholder of the Jane Goodall Institute Tanzania ("JGI-TZ") who reports an activity that he/she considers to be a misconduct, unethical, illegal or dishonest, as specified in this Policy. The whistleblower is not responsible for investigating the activity or for determining fault or corrective measures; appropriate management officials are charged with these responsibilities.

No Retaliation

It is contrary to the values of JGI-TZ for anyone to retaliate against any board member, employee or volunteer who in good faith reports a violation an ethical conduct, suspected violation of law, such as a complaint of discrimination, suspected fraud, or suspected violation of any regulation governing the operations of JGI-TZ. An employee who retaliates against someone who has reported a violation in good faith is subject to disciplinary action up to and including termination of employment.

Reporting Procedure

JGI has an open door policy and suggests that employees share their questions, concerns, suggestions or complaints with their supervisor. 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 the Head of Human Resources (HR) or the Executive Director. You may also submit your complaint anonymously to the installed suggestion boxes or via our website www.janegoodall.or.tz. Please see section below labelled, "*Confidentiality and Protection against Retaliation.*"

Supervisors, Directors, Managers, and the Head of HR are required to report complaints or concerns about suspected ethical and legal violations in writing to **JGI-TZ's Compliance Officer, who is the Executive Director**. All are encouraged to use the reporting form identified in '*Appendix A*'. The Compliance Officer has the responsibility to oversee the investigation of all reported complaints, unless the complaint directly involves the Compliance Officer. It is the responsibility of the Management of JGI-Tanzania to ensure compliance to our policies and discipline/penalize an employee for a breach of the same.

Compliance Officer

The Compliance Officer is responsible for ensuring that all complaints about unethical or illegal conduct are investigated. The Compliance Officer in consultation with at least any three selected members of senior management team will determine whether the reported issue or conduct require to be reported to the Board, determination will be done exclusively if the issue or conduct is very serious and upon completed investigation.

The Compliance Officer is obliged to conduct any investigation in line with the processes described in “*Appendix B*”: *Compliant Review Process*.

Acting in Good Faith

Anyone filing a written 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 offense.

Confidentiality & Protections against Retaliation

Whistleblower protections are provided in two important areas -- confidentiality and against retaliation.

JGI encourages anyone reporting a violation to identify himself or herself when making a report in order to facilitate the investigation of the violation. However, reports may be submitted on a confidential basis by *filling out a reporting form and sending via the whistleblowing page on JGI-TZ website (<https://janegoodall.or.tz/en/whistle-blowing>)*. Insofar as possible, the confidentiality of the whistleblower will be maintained. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law and to provide accused individuals their legal rights of defense.

JGI-TZ will not retaliate against a whistleblower. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, or poor work assignments and threats of physical harm. Any whistleblower who believes he/she is being retaliated against must contact the Human Resources Director immediately or the Whistleblower Compliance Officer. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

Handling of Reported Violations

JGI-TZ’s Compliance Officer or the Head of HR will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation, to the extent reasonably possible and consistent with any privacy or confidentiality limitations. If no further action or investigation is to follow, an explanation for the decision will be given to the complainant.

All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.



APPENDIX A: WHISTLEBLOWER REPORTING FORM

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JANE GOODALL INSTITUTE WHISTLEBLOWER REPORTING FORM

The purpose of this form is to provide a mechanism to encourage reporting of any action or suspected action taken within **the Jane Goodall Institute Tanzania (JGI-TZ)** that is illegal, fraudulent, unethical or in violation of any published policy of the JGI Tanzania. Anyone reporting a violation must act in good faith, without malice to JGI-TZ or any individual, and have reasonable grounds for believing that a violation occurred. *[Any report that the complainant has made maliciously or any report that the complainant has good reason to believe is false will be viewed as a serious disciplinary offense.]*

NO ONE WHO IN GOOD FAITH MAKES A REPORT OR COOPERATES IN THE INVESTIGATION OF A VIOLATION SHALL SUFFER HARASSMENT, RETALIATION, OR ADVERSE EMPLOYMENT CONSEQUENCES.

➤ Is this the first time you are filing a report for the improper conduct?

_____ Yes

_____ No, please state the date(s) or approximate date(s) of your previous report(s).

Name of Person Filing Report*

*You are not required to provide your name and may retain anonymity. If you choose to provide your name, it will remain confidential whenever possible. Providing your name may facilitate the investigation of the misconduct. Anyone filing an anonymous report will not be updated as to the progress of the investigation, but do understand that investigations are taken seriously and will be addressed. Making a complaint does not automatically shield you from consequences of your own involvement in unlawful or improper conduct. However, full and frank admissions may be considered in deciding disciplinary actions.

Name

Name of Person(s) Subject to this Complaint

Date

Name

Relation/Position**

**If this person is not an employee of the JGI Tanzania, please list his or her position or relationship to JGI (e.g., Board Member, Volunteer, Vendor).

Complaint Report

Please include as much detail as possible to enable a thorough investigation of the matter. Please go beyond the question prompts and the lines provided if necessary to adequately describe the matter.

What act occurred and how do you believe it was fraudulent, illegal, or inappropriate?

If applicable - please describe the nature of any injury or damage sustained.

When and where did the misconduct occur?

(Please indicate if the actions were committed over a period of time)

What do you believe enabled the act(s) to occur? E.g.: a lack of controls, circumvention of controls, or collusion with other individuals? Are you aware of any motives for the misconduct?

Does the misconduct involve the participation of people external to the JGI-TZ?

Are there any witnesses that can confirm the misconduct?

EVIDENCE: Please attach a copy or original of any supporting documents or other evidence in your possession, if any. **DO NOT ATTEMPT TO OBTAIN** more evidence. You are a reporting party and not an investigator of the misconduct.



APPENDIX B: COMPLAINT REVIEW PROCESS

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JANE GOODALL INSTITUTE TANZANIA COMPLAINT REVIEW PROCESS

ARTICLE I: INTRODUCTION

In accordance with JGI-TZ's Whistleblower Policy (the "Policy"), this Complaint Review Process sets forth procedures to be followed by JGI upon receipt of a complaint covered under the Policy.

ARTICLE II: COMPLIANCE OFFICER

The Compliance Officer is responsible for promptly investigating all complaints. If warranted by the investigation, the Compliance Officer will, in consultation with the at least any three selected members of senior management determine appropriate corrective action to be taken. In the event that a complaint concerns the Compliance Officer, the complaint shall be investigated by the Head of Human Resources under close supervision of the Board.

ARTICLE III: COMPLAINT REVIEW PROCEDURE

The Compliance Officer will notify the complainant and acknowledge receipt of a complaint within 10 business days, but only to the extent that the complainant's identity is disclosed or a return address is provided.

The Compliance Officer will make initial inquiries in consultation at least any three selected members of senior management, to determine whether further investigation is necessary or appropriate. The Compliance Officer will manage any subsequent investigation, and may request the assistance of legal counsel or other parties as he or she deems necessary or appropriate.

The Compliance Officer, or his or her designee, will fully investigate the complaint, meeting separately with the complainant and with others who either are named in the complaint or who may have knowledge of the facts set forth in the complaint. The Compliance Officer will explore anonymous complaints to the extent possible, but will weigh the prudence of continuing such investigations against the likelihood of confirming the alleged facts or circumstances from attributable sources.

Upon completion of the investigation, the complainant will be notified about what actions will be taken, to the extent reasonably possible and consistent with any privacy or confidentiality limitations. If no further action or investigation is to follow, an explanation for the decision will be given to the complainant.

ARTICLE IV: CONFIDENTIALITY

Complaints and their investigation will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation, to comply with all applicable laws, and to cooperate with law enforcement authorities.

ARTICLE V: REPORT TO THE EXECUTIVE DIRECTOR AND THE BOARD

Within five business days of receiving a complaint, the Compliance Officer shall appoint an investigation committee, the committee shall submit an investigation report to the **Executive Director** containing the following information:

1. The allegations made by the complainant and how they were reported to the Employer.
2. All relevant facts gathered related to the allegations.
3. How the Investigation was conducted, including witnesses interviewed and documents reviewed.
4. The recommended measures to be taken at the conclusion of the investigation.

Thereafter, if there is evidence, the Compliance Officer will form a disciplinary committee at least every five working days, or sooner if requested.

Upon completion of the disciplinary hearing, the Compliance Officer may determine if there is a need to share the feedback with the Board.