



Global Whistleblowing Policy

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Revision and Approval

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1. Purpose

ACE is committed to functioning in an open, transparent, and ethical manner, where individuals who report illegal, dishonest, or fraudulent activity in good faith or cooperate with duly authorized investigations into such misconduct will be protected against retaliation or fear of retribution.

2. Policy Statement

ACE encourages the reporting of serious misconduct or wrongdoing and commits to providing a timely investigation into any reports of misconduct and to reporting the outcome of the investigations to the relevant person(s) by having clear processes and procedures in place for redress.

This Policy sets out the ways in which individuals may raise concerns of misconduct or wrongdoing and how those concerns will be dealt with. These include fraud, bribery, corruption, theft, sexual exploitation, abuse and harassment, and retaliation or retribution.

3. Scope of the Policy

This Policy applies to i) ACE staff, ii) non-staff personnel, comprising individuals working with ACE through an established arrangement such as interns, volunteers, mentors, or other similar assignments, iii) individual consultants and contractors with a contractual arrangement, iv) partner organizations and institutions that deliver activities and services on behalf of ACE; and v) any party that is directly or indirectly affected by ACE's work in any market we are operating in.

This Policy applies to both internal and external cases where ACE funds, assets, and interests are involved. Suspicions should be raised in the first instance with the organization concerned, in accordance with its Whistle Blowing Policy, if available.

This Policy does not cover a mismanagement issue that does not pose a risk to ACE or the public, complaints of personal grievances, or matters for which there are other established processes for reporting and investigating, for example for staff under ACE's HR Policies and Procedures.

4. Reporting

The COO is the central contact point for raising concerns under this Policy, including suspicions and/or allegations of fraud, sexual exploitation, and abuse, or other corrupt practices related to ACE activities. The COO may be reached as follows:

1. Through our anonymous reporting form: <https://africancleanenergy.com/anonymous-contact/>
2. by a secure email address **anonymous@africancleanenergy.com**
3. by writing to the COO, African Clean Energy Laagte Kadijk 153h, 1018 ZD Amsterdam, the Netherlands, marked as 'Confidential'
4. by reporting face to face
5. An anonymous letter can also be written and delivered to the COO by any staff member

Where it would not be appropriate to report a concern directly to the ACE COO, for example where the Whistleblower believes they may be (or they are being subjected to) retaliation by ACE, or the COO, the whistleblower may choose to contact an external agency or independent confidential reporting service.

Concerns raised with external parties will be passed to the COO (or appropriate alternative senior role where it concerns the COO) within ACE to consider potential investigations. Personal details of the person reporting a concern, such as a name and contact information will not be shared unless consent is given to an external agency to share these details with the designated senior officers at ACE.

A person considering making a whistleblower report (the Whistleblower) should be as specific as possible when making a report and include details such as:

- The type of alleged wrongdoing;

- Where and when the events occurred;
- The names of the individuals involved and who else may have knowledge about the matters being reported;
- How the individual or organization committed the alleged wrongdoing;
- Why the Whistleblower believes the conduct should be investigated; and
- All documents and references to other sources that support the complaint.
- A Whistleblower is required to act in good faith and to have reasonable grounds concerning any report made under this Policy.

4. Investigations

The COO will assess whether the complaint discloses a matter that is covered under this Policy. If it does, then the COO (or Designee) will review the information provided and either escalate the matter to an internal investigator (or committee) to investigate the complaint.

The investigator(s) will determine the process and timeline but will endeavor to complete the investigation as quickly as practicable.

Once the investigation is concluded, based on the findings, the COO (or designee) will provide an investigation report to the appropriate parties for further action, if necessary.

Once an investigation has been completed, and subject to privacy and other legal obligations, the COO (or designee) will notify the reporting individual with the results of the investigation, where contact details are available.

If a complaint indicates that illegal activity has occurred, the HR (or designee) may bring the complaint directly to management for disciplinary action.

The above procedures and any investigation carried out are intended to be flexible in order to respond to the specific circumstances at issue. The intent is that a Whistleblower complaint will be managed by a person or committee of people within ACE who are not personally involved or otherwise in a conflict of interest with respect to the matter, recognizing the limited human and financial resource challenges that may arise. ACE reserves the right to engage in a different procedure as deemed appropriate in any given circumstance.

5. Actions

A finding of misconduct or wrongdoing may result in disciplinary action up to and including termination of employment in the case of an ACE staff member, and termination of the engagement or contractual arrangements or other appropriate action in the case of non-staff personnel, contractors, consultants, and partner organizations and institutions.

The making of any false, malicious, bad faith, or baseless allegations may result in disciplinary action up to and including termination in the case of an ACE staff member, and termination of the

engagement or contractual arrangements or other appropriate action in the case of contractors, consultants and partner organizations and institutions.

Senior Management of ACE, and if relevant the Board of ACE, will be informed of all reported incidents, with the identity of individuals protected. ACE reserves the right to inform other parties as may be required.

6. Confidentiality & Anonymity

All complaints under this Policy will be regarded as confidential but this does not guarantee anonymity.

- If a Whistleblower asks to remain anonymous, the identity will not be disclosed without the consent of the Whistleblower unless required by law. If the situation arises where the concern cannot be resolved without revealing the identity (e.g., evidence is needed in court), ACE will discuss with the individual who has reported the incident how to proceed. While ACE will take steps to protect the identity of the Whistleblower, ACE may determine that it should proceed with the matter despite the risk of disclosing the identity of the Whistleblower.

Given the technical and logistical requirements of investigating a complaint, anonymous complaints may be difficult to resolve when additional information is required. Whistleblowers will be encouraged to cooperate with an investigation and to provide their identity and contact information when making a Complaint in order to allow for a proper investigation, if necessary.

7. No Retaliation

No individual who in good faith reports a complaint under this Policy or participates in an investigation shall suffer harassment, retaliation, or adverse consequences.

Anyone who is found to have retaliated against a person for making a report under this Policy or for participating in an investigation under this Policy in good faith will be subject to corrective action as necessary, including discipline up to and including termination of employment in the case of an ACE staff member, and termination of the engagement or contractual arrangements or other appropriate action in the case of non-staff personnel, contractors, consultants, or partner organizations and institutions.

8. Policy Review

This Policy will be reviewed at least annually as seen fit. All updates to the Policy will be circulated to staff and made available on the various agreed platforms.



9. Annex 1: Definitions

Whistleblowing is the disclosure by a witness of actual or suspected misconduct or wrongdoing in an organization.

A **Whistleblower** is a person who reports serious misconduct or wrongdoing in accordance with this Policy.

Misconduct or wrongdoing includes behavior that:

- Is illegal, fraudulent, or corrupt
- An intentional or reckless breach of any other material legal obligation (other than an employment contract)
- Is unethical or breaches ACE's Code of Conduct
- Is potentially seriously damaging in a financial or non-financial (including reputation) manner to ACE, such as maladministration
- Is harmful or potentially harmful to the health and safety of others in the workplace
- Involves any kind of retaliatory action against a Whistleblower for having made a misconduct disclosure.

Retaliation means any direct or indirect detrimental action that adversely affects your employment or working conditions, where such action has been recommended, threatened, or taken for the purpose of punishing, intimidating, or injuring you because you engaged in protected activity under this Policy.

In **good faith** means that any concern raised by an individual is made in the genuine belief that the information provided is accurate and valid. When someone acts or speaks in good faith, they do so with the absence of deceit, fraud, malice, or the intent to harm others.

10. Annex 2: Process Flow Chart

