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Fairtrade ANZ Whistleblowing Protection Policy

Objectives

Fairtrade ANZ is committed ensuring that Fairtrade ANZ's work is done with the highest standards of integrity, respect, dignity, honesty and accountability. This includes maintaining an open workplace where any legitimate concerns can be reported with confidence and safety.

Fairtrade ANZ requires Board members, employees, volunteers, consultants, contractors, associates and partners to observe high standards of operation and ethics in the conduct of their duties and responsibilities. All personnel must practice integrity in fulfilling our responsibilities and comply with all applicable Fairtrade ANZ policies, laws and regulations.

Fairtrade ANZ also attaches great importance to identifying and remedying breaches in the Fairtrade Code of Conduct or other wrongdoings. In accordance with the Fairtrade Code of Conduct, Fairtrade ANZ actively promotes "whistleblowing", which means we encourage you to safely come forward, speak up, speak out and raise in good faith concerns of possible misconduct, fraud, corruption, harassment, abuse of authority, discrimination or other wrongdoings. We support a safe and open environment where such good faith reporting is viewed as a positive action – because you are protecting the best interests of the organization and securing its credibility as an ethical and fair employer.

This policy is intended to:

- provide a framework for the safe environment through which you can voice a concern or make an allegation in good faith without fear of reprisal or unfair treatment; and
- encourage persons associated with Fairtrade ANZ or its work to report suspected or actual occurrence(s) of illegal, unethical, safeguarding breaches or inappropriate events (conduct or practices) through fair, protective and easily accessible procedures without retribution or threat of retribution.

Related Policies

- Complaints Handling Policy
- Anti-Fraud and Anti-Corruption Policy
- Child and Vulnerable Adult Protection Policy
- Protection of Sexual Exploitation and Abuse Policy

Who does this Policy apply to?

This policy applies to all the people we work with and who work for Fairtrade ANZ, including:

- Board members
- Board Committee members
- Employees of Fairtrade ANZ ("staff members")
- Consultants and associates

- Individual Contractors
- Volunteers and Interns
- Implementing partners, donors and responsible parties engaged/contracted Fairtrade ANZ for a project or activities (“implementing partners”)

and to any behavior relating to work or in the context of work.

It is expected that all individuals familiarise themselves with this Policy, which is available on Fairtrade ANZ server.

Definitions

Eligible Recipient: the following persons within Fairtrade ANZ to whom a Whistleblowing report may be directed:

- an employee’s direct supervisor;
- any member of the Fairtrade ANZ Leadership Team, including the CEO; and
- the officers of Fairtrade ANZ, including the Directors and Company Secretary.

Misconduct: Actions or activities that go against our values or interests of Fairtrade ANZ or of the public, including (but not limited to):

- Any unlawful act whether criminal/ civil, including breach of law/regulation, contract or negligence
- Abuse of authority or unequal power relations
- Breach of financial policies and processes, including misappropriation of company funds/assets, fraud or suspected fraud or deficiencies in internal control and check or deliberate error in preparations of financial statements or misrepresentation of financial reports
- Breach of, or failure to implement or comply with, Fairtrade ANZ Policies
- Manipulation of company data/records
- Disclosure of confidential/propriety information
- Bullying, discrimination, sexual harassment, exploitation or abuse
- Use of the forced child labour and forced adult labour, including bonded labour and trafficked labour
- Retaliation or victimisation following the report of any suspected misconduct
- Other unethical conduct or breaches in the Fairtrade Code of Conduct, the ACFID Code of Conduct or the CID Code of Conduct.

Whistleblower: A person, who reports (suspected or actual) wrong doing, including suspicion of Misconduct in accordance with this Policy.

Whistleblowing a report by a Whistleblower of suspected or actual Misconduct. Whistleblowing does not include general complaints that do not relate to Misconduct, for example:

- cases of general discontent and dissatisfaction with Fairtrade ANZ or its services,
- questions regarding operational procedures, processes etc.,
- questions regarding the validity or interpretation of specific compliance guidelines or rules of procedure,
- staff job performance matters or interpersonal conflicts.

These matters can be raised in accordance with Fairtrade ANZ's Complaints Handling Policy.

Policy Statement

1. Any person (the Whistleblower) must promptly report suspected or actual Misconduct to an Eligible Recipient.
2. The Whistleblower will be protected from victimization, retaliation or retribution for a report of suspected Misconduct that is provided in good faith in accordance with this Policy.
3. A Whistleblower who makes a report that is not done in good faith may be subject to discipline, including termination of employment, appointment or contract, or other legal means to protect the interests of Fairtrade ANZ.
4. Anyone who victimises or retaliates against a Whistleblower for making a Whistleblowing disclosure in good faith will be subject to discipline, including termination of employment, appointment or contract.
5. Serious crimes against persons or property, such as assault, rape, burglary, etc, shall immediately be reported to local law enforcement personnel or other relevant agencies where appropriate and applicable.
6. Supervisors, managers, Board members or any other persons who receive a Whistleblowing disclosure must promptly and safely act to implement an investigation of the alleged Misconduct and/or to resolve the issue in accordance with this policy.
7. The identity of the Whistleblower, if known, and any information provided or received as part of the investigation of a Whistleblowing disclosure shall remain confidential and shall only be disclosed to those persons directly involved in investigating the alleged Misconduct the subject of the Whistleblowing disclosure.
8. Any person who is the subject of a Whistleblowing disclosure will be afforded the right to procedural fairness in the investigation of the allegation of Misconduct.

Reporting a Suspicion

Internal Reporting

A person (Whistleblower) who, in the course of or in connection with their duties, discovers that serious irregularities or Misconduct may have occurred or may be occurring, are obliged to report this discovery to an Eligible Recipient as soon as possible.

The Whistleblower can select one of the following methods, or another method to notify an Eligible Recipient of alleged Misconduct:

- Telephone or email their immediate supervisor or any member of the Leadership Team or Board;

- Email to the Company Secretary at: sophie@fairtrade.com.au
- Email to the Chair of the Board at: Katherine.rich@fgc.org.nz
- Post a letter to:

In Australia:
 Private and Confidential
 Whistleblower Protection
 Fairtrade ANZ
 Suite 312, 838 Collins Street,
 Docklands VIC 3008
 Phone: +61-3-9602 2225
 E-mail: info@fairtrade.com.au (with subject line: Confidential Whistleblower Report)

In New Zealand:
 Private and Confidential
 Whistleblower Protection
 Fairtrade ANZ
 PO Box 33 1587, Takapuna, Auckland 0740
 Phone: +64 9920 4950
 E-mail: info@fairtrade.org.nz (with subject line: Confidential Whistleblower Report)

If the conduct concerns a member of the Leadership Team or a Director, Whistleblowers are encouraged to report by email to the Chair of Fairtrade ANZ at: john.buttler@capitalc.us or at phone: +61(0)424 139 266

Where possible Whistleblowing reports should be provided in writing, however verbal information may be provided to a Fairtrade ANZ representative who will then complete the written process. Farmers may make a verbal or written submission to their Association representative, or higher member, to represent them to Fairtrade ANZ.

If the Whistleblower is uncomfortable or otherwise reluctant to report to his/her supervisor, then the Whistleblower may report the allegation or event to the next highest or another level of management, including to the CEO or a Board committee or member.

The Whistleblower can report the event with his/her identity or anonymously. However, Whistleblowers are encouraged to put their name to the allegation whenever possible. Otherwise, it will be difficult to protect the Whistleblower and give feedback.

Supervisors are urged to create and enable a culture of open and safe communication and to listen actively to concerns. Supervisors must prevent discrimination against or threats to their staff or any person acting on behalf of the Fairtrade ANZ or associated with Fairtrade ANZ's work.

External reporting

Whilst internal reporting is encouraged in the first instance, if the Misconduct relates to allegation of serious breach of the law, you may bypass the internal reporting system and make a report directly to the relevant authorities. The protection to the Whistleblower will still apply in these circumstances so long as the report was made in good faith.

Complaints regarding breaches of the ACFID Code of Conduct can be made to the ACFID Code of Conduct Committee. For information on the ACFID Code of Conduct and how to make a complaint, see the ACFID website: www.acfid.asn.au.

Complaints regarding breaches of the CID Code of Conduct can be made to the CID Code of Conduct Committee. For information on the CID Code of Conduct and how to make a complaint, see the CID website: www.cid.org.nz

Further to using ACFID and CID, whistleblowers can contact NZ The State Services Commission in accordance with the *Protected Disclosure Act 2000* in New Zealand.

Compliant and Allegation Handling

1. The recipient of the Whistleblowing disclosure must ensure that concerns raised are taken seriously. The recipient of the disclosure must escalate the case to the CEO of Fairtrade ANZ for further investigation and due and fair process. If the allegation relates to conduct of the CEO, the matter must be instead escalated to the Chair of the Board.
2. Where required, the CEO or Chair will formulate a committee with skilled and experienced persons and appoint a lead and neutral investigator for investigation. All potential or actual conflict of interest issues would be weighted and removed before engaging in the investigation.
3. The committee shall bring all relevant stakeholders together, to determine whether the suspicion or allegation reported is one that should be investigated or not, and whether it needs to be reported to any statutory authorities. If it is decided to proceed with an investigation, the suspicion becomes known as an allegation of misconduct or wrongdoing. An investigation plan will then be formulated by the case committee to ensure all relevant questions are addressed, the scale of the investigation is in proportion to the seriousness of the allegation(s) and sufficient resources are allocated.
4. Strict confidentiality will be maintained during the investigative process. All information obtained will be properly secured to prevent unauthorized access. All relevant witnesses or involved parties will be interviewed including the subject of allegation (whom will be interviewed at last) and related documents examined. Contemporaneous notes of all discussions, phone calls and interviews will be made.
5. If an allegation is made in good faith and reasonably believing it to be true, but it is not confirmed by the investigation, the Whistleblower will be protected by this policy. If the Whistleblower has made an allegation frivolously or in bad faith appropriate disciplinary action will be taken, including dismissal for serious or repeated offences.
6. The investigator/committee will provide feedback to the Whistleblower and the Eligible Recipient of the Whistleblowing report on the progress or outcome of an investigation within a reasonable period of time, having regard to the circumstances and the nature of the Whistleblowing report.
7. Should the Whistleblower have concerns about the progress of the investigation, this should be escalated to the CEO or Chair.
8. At the end of the investigation, a report will be completed and provided to the Eligible Recipient and the CEO or Chair, outlining the process that has been undertaken, the determined outcome and recommendations for remediation or other action where required.

Data Protection and Confidentiality

1. All Whistleblowing disclosures, regardless if these are true or not, have the potential to damage the reputation of the subject, the Whistleblower and / or third parties as well as Fairtrade ANZ. Therefore, all information will be treated confidentially.
2. Only persons directly involved in the investigation of the Whistleblowing disclosure will be provided with the Whistleblowers name (if known) and information regarding the alleged Misconduct.

- Any written Whistleblowing disclosures and Whistleblowing investigation reports will be stored in a secure location to maintain confidentiality of the records.

Approval and Review

This policy will be reviewed once every 3 years.

Document version	Date approved and by whom	Review Date
1.0	March 2020 Fairtrade ANZ Board	March 2023