

WHISTLEBLOWING AND GRIEVANCE POLICY

Page	Reason for change	Version	Release date	Reviewer
All	New Policy	001	26/07/2024	WJRC
All	Amendment	002	19/01/2025	NJB

Purpose

Henderson Asset Protection (HAP) is committed to fostering an ethical, transparent and respectful working environment in Tanzania and worldwide. This policy establishes our stance on how grievances and whistleblowing matters are addressed, ensuring alignment with ISO 18788, PSC.1, and ISO 9001.

Scope

This policy applies to all employees, contractors, consultants, and any other individuals working for or on behalf of Henderson.

Definitions

- **Whistleblowing:** Reporting by employees or other stakeholders of illegal, unethical, or inappropriate behaviour within the organisation.
- **Grievance:** A formal complaint raised by an employee regarding work-related issues, including but not limited to working conditions, interpersonal conflicts, and perceived unfair treatment.

Policy Statement

Open Reporting Environment

HAP encourages everyone to report any concern relating to misconduct, unethical behaviour, or potential violations of law, regulations, or internal policies.

Non-Retaliation

Retaliation in any form against individuals who raise genuine concerns or file grievances in good faith is strictly prohibited. Any retaliatory action may result in disciplinary measures, up to and including termination of employment or contract.

Confidentiality

HAP treats all reports and grievances with strict confidentiality. Information is shared only with those directly involved in reviewing or resolving the concern. Where legally permissible, the identity of reporters or complainants will be protected.

Impartiality and Fairness

All grievances and whistleblowing concerns will be addressed objectively and fairly. Decisions will be based on evidence, ensuring that no one is unfairly treated or discriminated against.

Compliance with Standards and Laws

HAP abides by applicable Tanzanian laws, as well as the international standards set out in ISO 18788, PSC.1, and ISO 9001. We integrate these requirements into our management systems and continuously improve our practices.

Oversight and Accountability

Senior Management is responsible for overseeing the implementation and effectiveness of this policy. All personnel have a duty to comply and to promote a culture of ethical behaviour.

Whistleblowing and Grievance Reporting Channel

- **Email:** whistleblowing@hendersonrisk.com

Employees and stakeholders are encouraged to use this channel to report any concerns or grievances. Anonymous reports are permitted; however, providing contact details can help expedite clarifications and feedback.

Continuous Improvement

HAP is committed to reviewing and improving this policy in line with changing legal and regulatory requirements, as well as best practices under ISO 18788, PSC.1, and ISO 9001.

Approval and Implementation

This Whistleblowing and Grievance Policy has been approved by HAP's management and is effective as of the date of issuance. All employees are required to familiarise themselves with its contents and adhere to its provisions.

This policy will be communicated to all employees, contractors, and relevant stakeholders. It will be available on request and on the company website.

Nikolas Bailey
Group Operations Manager