

## **WHISTLEBLOWING POLICY**

### **1. COMMITMENT TO ETHICAL BEHAVIOUR**

Uganda Healthcare Federation is committed to a culture of high corporate compliance and high ethical behavior. The ethical values of the company are illustrated to all employees in the UHF hiring policy. This outlines that UHF believes in the strong ethical values of integrity and business honesty.

### **2. OBJECTIVE OF THIS POLICY**

The UHF Whistle blowing Policy establishes a system for the reporting of “Reportable Conduct” (see below) where the person is apprehensive about raising his/her concern because of the fear of possible adverse repercussions to him/her in relation to Reportable Conduct ("Report"). The system encourages employees to report their concerns preferably openly, but if necessary enables disclosures to be made anonymously to staff HR manager.

This Policy also provides the guidelines for the support and protection of individuals making Reports, and further establishes a system for the matters disclosed to be investigated, and rectifying action to be taken.

### **3. APPLICATION OF THIS POLICY**

This Policy applies to all of UHF subsidiaries.

### **4. STATEMENT OF SUPPORT TO WHISTLEBLOWERS**

UHF is committed to the aims and objectives of an effective Whistleblower Protection Program It does not tolerate improper conduct by its employees, managers, or executives, nor the taking of reprisals against those who come forward in good faith and on a proper basis to disclose such conduct.

UHF recognises the value of transparency and accountability in its administrative and management practices, and supports the making of disclosures that reveal corrupt conduct, conduct involving a substantial mismanagement of company resources, conduct involving a substantial risk to our employee’s or customers’ health and safety, or conduct that represents a risk to the environment.

### **5. REPORTABLE CONDUCT**

Under this Policy, “Reportable Conduct” is conduct by a person or persons connected with UHF, in the view of whistleblower acting in good faith, is:

- (a) dishonest;
- (b) fraudulent;
- (c) corrupt;



**UGANDA  
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Plot 66 Kanjokya Street, Kampala Uganda

Tel: [+256 754 667 022](tel:+256754667022)

Email: [info@uhfug.com](mailto:info@uhfug.com)

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- (d) illegal (including theft, drug sale/use, violence or threatened violence and criminal damage against property);
- (e) discriminatory;
- (f) sexual harassment;
- (g) failure to comply with any obligation under laws of Uganda
- (h) unethical (i.e. including a breach of the UHF Code of Ethics);
- (i) other serious improper conduct (including gross mismanagement, serious and substantial waste or repeated breaches of administrative procedures);
- (j) an unsafe work-practice;
- (k) not in compliance with UHF policies;
- (l) any other conduct which may cause financial or non-financial loss to UHF or the consolidated entity or be otherwise detrimental to the interests of UHF or the consolidated entity, or any of its employees;
- or
- (m) deliberate concealment of the above.

For the purpose of this Policy a “whistleblower” is a person, being a director, manager, employee or contractor of UHF or a subsidiary of UHF, where the person is apprehensive about raising his/her concern because of the fear of possible adverse repercussions to him/her in relation to Reportable Conduct and who makes a Report under this Policy.

This Policy and the procedures outlined within this Policy are not designed to deal with general employment grievances and complaints. Any report treated in accordance with this Policy must be for one of Reportable Conduct as outlined above. All general employment complaints or grievances will be forwarded to the respective manager to address.

## **6. REPORTING PROCEDURES**

Any person who has reasonable grounds to suspect that Reportable Conduct has occurred and is apprehensive about raising his/her concern because of the fear of possible adverse repercussions to him/her is encouraged to report that suspicion in one of the following ways.

6.1 By contacting the HR manager

6.2 UHF would prefer that whistleblowers make a Report openly and disclosed their identity. However, under this Policy whistleblowers can make a Report anonymously

6.3 The whistleblower can make Reports in writing.

Whistleblowers should be aware that it will be more difficult to investigate and take action in relation to Reportable Conduct that is made anonymously and maintaining the anonymity of the whistleblower's identity may be difficult where the nature of the Reportable Conduct points to a particular individual or individuals having made it or where some disclosure is necessary as part of the investigation process.



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## 7. PROCEDURES FOLLOWING DISCLOSURE

The following process will generally be followed in relation to suspected Reportable Conduct:

### 7.1 Receiving and Accepting a Report

On receiving a Report, the relevant UHF HR manager will decide whether to accept the Report and whether the Report is about Reportable Conduct for the purposes of this Policy.

Subject to what is said about Corporations Act breaches below, the HR manager may decline to accept a Report if they consider that:

- the alleged conduct is not Reportable Conduct under this Policy;
- the Report is not made in good faith or is frivolous, vexatious or malicious;
- the Report is made anonymously and there is insufficient information to allow the AHL Incident Manager to investigate the matter;
- the subject matter of the Report has been satisfactorily dealt with or resolved previously through the procedure set out in this Policy (unless another alleged incident has occurred since);
- the subject matter of the Report has been satisfactorily dealt with or resolved through another grievance, reporting, complaint or claims procedure. The HR manager will decline to accept a Report if the Report is in effect an 'appeal' from a decision already made by under another grievance, reporting, complaint or claims procedure; or
- some other more appropriate grievance, reporting, complaint or claims procedure in relation to the subject matter of the Report is available to the whistleblower – for example, the matter should be reported through the occupational health and safety reporting mechanisms or other grievance procedures.

### 7.2 Investigations

Where the HR Manager has accepted a Report under this Policy and considers the subject matter is significant, he or she will generally conduct an investigation.

However, the HR manager has the discretion to determine that – in all the circumstances - it is not appropriate or necessary to conduct an investigation.

### 7.3 Reporting

At the conclusion of their investigations, the Federation Internal Audit Manager or external investigator (if they are involved) may prepare a report of the findings to the HR manager.

### 7.4 Actions Taken

Subject to any statutory confidentiality limitations, at the conclusion of the investigation the relevant HR Manager will notify and may prepare a report to the UHF Board of directors.

Where the final report indicates that the Reportable Conduct has occurred, the final report will include recommendations for steps to be taken to prevent the conduct from occurring in the future, as well as



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any action that should be taken to remedy any harm or loss arising from the conduct including disciplinary proceedings against the person responsible for the conduct and the referral of the matter to appropriate authorities as is deemed necessary.

#### 7.5 Communications to the Whistleblower

Unless it is inappropriate to do so, the relevant HR Manager will ensure that the whistleblower is kept informed of the outcomes of the investigation of his/her allegations, subject to the considerations of privacy of those against whom allegations are made and any other issues of confidentiality.

## 8. PROTECTION OF THE WHISTLEBLOWER

### 8.1 General

Wherever possible, UHF recognises that maintaining appropriate confidentiality is important in ensuring that potential whistleblowers come forward and disclose their knowledge or suspicions about Reportable Conduct in an open and timely manner and without fear of reprisals being made against them.

UHF will take all reasonable steps to protect the identity of the whistleblower if that is practicable, and will adhere to any statutory requirements in respect of the confidentiality of disclosures made.

However, maintaining confidentiality of the identity of the whistleblower may be difficult where the nature of the Report points to one particular individual having made it or due to the inherent nature of the investigation process. The HR Manager may need to discuss with the whistleblower the possibility that other staff may deduce his or her identity without the he or she having told the individual of the whistleblower's identity.

Where the identity of the whistleblower is to be disclosed, the whistleblower should, where practicable, be informed of this in advance.

The HR Manager must ensure that all documentation and information relating to the Report is kept secure.

In appropriate cases, disclosure of the whistleblower or the allegation made by them may be unavoidable, such as if court proceedings result from a disclosure pursuant to this Policy or if the proper investigation of the Report requires such disclosure.

### 8.2 Reprisals

UHF will not tolerate any victimization of a person because they have made a report under this Policy.

However, you will need to appreciate that a complaint is a serious matter and can have serious consequences for the person or persons who are subject to the complaint. Accordingly, if UHF concludes that a report is false, vexatious or malicious, then UHF may consider disciplinary action against the person making the complaint.

## 9. WHISTLEBLOWER'S LIABILITY



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A whistleblower remains liable for his or her own conduct that may constitute Reportable Conduct. UHF has no power to offer any person immunity against prosecution in the criminal jurisdiction, nor does UHF have any authority to reduce the penalty applicable if the conduct disclosed is criminal.

## **10. FALSE ALLEGATIONS**

UHF is committed to the protection of genuine whistleblowers against reprisals. However, where it is shown that a person purporting to be a whistleblower has knowingly made a false report, or not made a Report in good faith, of Reportable Conduct, that conduct itself will be considered a serious matter and may render the person concerned subject to disciplinary proceedings (which may include termination of employment).

## **11. REVIEW**

The content of this Policy may be reviewed from time to time by the UHF executive director. In particular, the director may have regard to complaints, reports and recommendations made regarding compliance with this Policy, including the investigations undertaken and the impact on whistleblowers personally. Any amendments to the Policy shall be approved by the UHF board of directors.

This Policy is not a term of any contract, including any contract of employment. This Policy may be varied by UHF from time to time, in its absolute discretion.