

OCI Foundation International

Sponsors of the: (i) Cyfed Undergraduate Scholarships (ii) CBH Scholarships (iii) IFOMSSA Junior Awards (iv) IFOMSSA Senior Awards and (v) Annual JAMB Awards (vi) ArOF Health Campaign (vii) LAMS Initiative (viii) The Gynocular Project



Whistleblowing Policy (March 2025)

Introduction

The OCI Foundation requires its members and associates to observe and maintain high standards of business and personal ethics in the conduct of their duties and responsibilities. They must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations. To sustain these expectations, all staff and associates who are aware of possible wrongdoings within the OCI Foundation are responsible for reporting them. This Policy Document provides a guide on this.

Reporting Responsibility

This Whistleblower Policy aims to encourage and enable OCI Foundation employees and other associates to raise internal concerns when wrongdoings are observed so that corrective actions can be taken.

All board members, officers, employees and volunteers are responsible for reporting concerns about violations of the OCI Foundation's code of ethics or suspected violations of law or regulations that govern the organisation's operations.

No Retaliation

It is contrary to the values of the OCI Foundation for anyone to retaliate against any implementing partners, staff, volunteers, contractors, directors, officers, board members, employees or anyone who, in good faith, reports an ethics violation or a suspected violation of law such as a complaint of discrimination, suspected fraud, or suspected violation of any regulation governing the operations of the Foundation. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

Reporting Procedure

The OCI Foundation has an open-door policy and suggests that employees, contractors, partners, and volunteers share their questions, concerns, suggestions or complaints with their supervisors. A staff member who is uncomfortable speaking with a supervisor or is dissatisfied with a response can speak with the Chairman of the Board of Directors. Supervisors and managers must report complaints or concerns about suspected ethical and legal violations in writing to the Board Chairman of the OCI Foundation, who is responsible for investigating all reported complaints. Employees with concerns or complaints may also submit their concerns in writing directly to their supervisor or the Board Chairman.

Compliance Officer

The OCI Foundation's Compliance Officer is the Board Chairman. He is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Chairman will advise the Board of all complaints and their resolutions. This should be done at least once annually.

Accounting and Auditing Matters

The OCI Foundation's Board Chairman should immediately notify the Board of Directors of any concerns or complaints regarding corporate accounting practices, internal controls or auditing and work with the committee until the matter is resolved.

Acting in Good Faith

Anyone filing a written complaint concerning a violation or suspected violation must act in good faith and have reasonable grounds to believe that the disclosed information indicates a violation. Allegations that prove to have been made maliciously or knowingly false will be viewed as a serious disciplinary offence.

Confidentiality

Violations or suspected violations may be submitted confidentially. Reports of violations or suspected violations will be kept confidential to the greatest possible extent and consistent with the need to conduct an adequate investigation.

Handling of Reported Violations

The Board Chairman will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation.

Review of Policy Document

This policy is subject to review in March 2028, three years after its implementation. Our appraisal tool will be used as part of that review. However, it can be sooner if legislation or other events warrant it.

Feedback

- If you have any feedback on the OCI Foundation on this document, please contact us immediately via the link [HERE](#).
- For our various countries of operation, these OCI Foundation numbers can also be reached:
 - a) Australia: +61755808331
 - b) Nigeria: +2348066092959
 - c) United Kingdom: +447415676767
- Contact Details for Whistle Blowing in Various OCI Foundation countries of operations (these are in addition to our internal reporting mechanisms already explained):

- a) Australia: Contact can be made by email to PID@ombudsman.gov.au, phone call to 1300 362 072 or by writing to the Public Interest Disclosure Team at GPO Box 442, Canberra ACT 2601.
- b) Nigeria: Individuals can contact the Federal Ministry of Finance, Budget and National Planning through their online portal or by writing to the Presidential Initiative on Continuous Audit unit. They can also be reached on 09098067946. Additionally, the Central Bank of Nigeria (CBN) has a whistleblowing email address, anticorruptionunit@cbn.gov.ng.
- c) UK: Serious wrongdoings (like fraud, bribery, or criminal activity) can be reported to the relevant regulatory body (e.g., the Financial Conduct Authority, the Health and Safety Executive) or to the police.