CORPORATE POLICY

Whistleblowing (Speak Up) Policy

POLICY NUMBER	OPES-POL-04
VERSION	IFC
POLICY OWNER	Compliance Officer
APPROVED BY	Board of Directors, 6 March 2025
EFFECTIVE DATE	6 March 2024
NEXT REVIEW	12 months after approval
APPLIES TO	OPES personnel, clients, suppliers, community members and any other person

1. Purpose

OPES wants to hear about wrongdoing as early as possible. This policy explains how anyone, inside or outside OPES, can raise a concern safely and confidentially, how we will handle it, and how we protect the people who speak up.

2. What to report

You should report any genuine concern about actual or suspected:

- Bribery, corruption, fraud, theft or money laundering
- Breaches of sanctions, law or OPES policies
- Health, safety or environmental dangers
- Sexual exploitation, abuse or harassment (SEAH), discrimination or bullying
- Human rights or labour abuses, including in our supply chain
- Conflicts of interest that have not been declared
- Retaliation against someone who has spoken up
- Deliberate concealment of any of the above

You do not need proof. A reasonable belief is enough.

3. How to report

Concerns can be raised through any of these channels, in English or any local language:

Channel	Details

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Line manager	In person or in writing
Compliance Officer	operations@opesafrica.com (for the attention of the Compliance Officer)
Confidential email	ethics@opesafrica.com (accessible only to the Compliance Officer and Board Chair)
Board Chair	For concerns involving senior management, a written report addressed to the Chair of the Board
External	Where appropriate, the relevant authority, such as Ghana's Office of the Special Prosecutor, or the funder of the project concerned

Reports may be made anonymously. Please give as much detail as possible (what, who, when, where) so that the concern can be investigated.

4. Protection from retaliation

OPES will not tolerate retaliation of any kind against anyone who raises a concern in good faith or helps with an investigation. This includes dismissal, demotion, harassment, loss of work or contract, and threats. Retaliation is a disciplinary offence.

This protection applies even if the concern turns out to be mistaken. It does not apply to reports that are knowingly false or malicious, which will be treated as misconduct.

OPES's approach is consistent with Ghana's Whistleblower Act, 2006 (Act 720) and the whistleblowing provisions of the Norwegian Working Environment Act.

5. Confidentiality

The identity of the whistleblower, and the information they provide, will be shared only with those who need it to investigate, unless the whistleblower consents or the law requires disclosure.

6. How we handle reports

1. **Acknowledge** the report within 5 working days, where the reporter can be contacted.
2. **Assess** whether the concern falls under this policy and what kind of investigation is needed.
3. **Investigate** independently. No one implicated in a concern will take part in its handling. Serious matters, or those involving senior management, are escalated to the Board Chair and may be investigated by an external firm.
4. **Protect** the whistleblower and any affected people, including survivors of SEAH, throughout the process.
5. **Act** on the findings, which may include disciplinary action, reporting to authorities, informing funders and fixing control weaknesses.
6. **Close and inform** the whistleblower of the outcome where possible, normally within 90 days.

7. Reporting to funders and clients

Where a confirmed or credible allegation relates to a project funded by a development finance institution or international organisation, OPES will notify that funder in line with its contractual requirements, typically within the timeframe the funder sets.

8. Records and oversight

The Compliance Officer keeps a confidential register of all reports and their outcomes. An anonymised summary is reported to the Board at least twice a year.

9. References

- Ghana Whistleblower Act, 2006 (Act 720)
- ISO 37002 Whistleblowing management systems
- Code of Conduct and Business Ethics (OPES-POL-01)
- SEAH Prevention Policy (OPES-POL-09)