
WHISTLEBLOWER POLICY

Center for Microenterprise
Development Ltd/Gte

Management

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WHISTLEBLOWER POLICY

1 POLICY STATEMENT

Center for Microenterprise Development Ltd/Gte (hereafter known as “CMD” or “the company”) is committed to conducting its business with honesty and integrity at all times. If, at any time, this commitment is not respected or appears to be in question, **CMD** will endeavour to identify and remedy such situations. Therefore, it is the company's policy to ensure that when a person has reasonable grounds to believe that an employee, manager or any other person related to the company has committed, or is about to commit, an offence that could harm the company's business or reputation, it denounces the wrongdoers in question.

The whistleblowing policy has been put in place to:

- Encourage employees, partners or managers to disclose this information or behaviour;
- Protect complainants from reprisals;
- Treat all parties to an investigation in a fair and equitable manner;
- Ensure confidentiality as much as possible;
- Take corrective and disciplinary action if wrongdoing is discovered.

2 PURPOSE

The purpose of this whistleblowing policy is to encourage current and former employees, contractual third parties or partners to communicate events that raise serious concerns about **CMD**. **CMD** encourages and will support staff who report illegal practices or individuals who violate the organization's policies.

3 SCOPE

This policy applies to all employees of **CMD**, as well as contractual third parties or partners doing business with the company.

4 DUTY TO REPORT MISCONDUCT

It is the duty of all employees, contractual third parties or partners to report misconduct or suspected misconduct, including fraud and financial impropriety to the board. This includes misconducts such as but not limited to:

- Providing false or misleading information, or withholding material information on **CMD** financial statements, accounting, auditing or other financial reporting fraud or misrepresentation;
- Pursuit of material benefit or advantage in violation of **CMD's** Conflict of Interest Policy;
- Misappropriation or misuse of **CMD** resources such as funds, supplies or other assets;
- Unauthorized alteration or manipulation of computer files;
- Destroying, altering, mutilating, concealing, covering up, falsifying, or making a false entry in any records that may be connected to an official proceeding, in violation of federal, provincial or state law or regulations or otherwise obstructing, influencing, or impeding any official proceeding, in violation of federal, provincial or state law or regulations
- Violations of federal, provincial or state laws that could result in fines or civil damages payable by **CMD**, or that could otherwise significantly harm **CMD** 's reputation or public image;
- Unethical business conduct in violation of any **CMD** policies and/or **CMD** Code of Conduct;
- Danger to the health, safety, or well-being of employees and/or the general public;
- Forgery or alteration of documents;
- Authorizing or receiving compensation for goods not received or services not performed, or paying for services or goods that are not rendered or delivered;
- Authorizing or receiving compensation for hours not worked;

- Embezzling, self-dealing, or otherwise obtaining an unlawful private benefit (i.e., **CMD** assets being used by anyone in the organization improperly for personal gain).

5 ACTING IN GOOD FAITH

Any person who files a complaint alleging misconduct must act in good faith and have reasonable grounds to believe that the information disclosed indicates wrongdoing.

No employee, third party contractor or partner who makes a denunciation in good faith will be subject to retaliation. Retaliation is any direct or indirect harmful action that threatens a person or is taken against a person who has reported an event or action. Anyone who retaliates against a person who has made a report in good faith is subject to disciplinary action up to and including dismissal.

However, making allegations that are deemed unfounded and malicious or knowingly false may result in disciplinary action up to and including termination of employment.

6 PROCEDURE

A complaint may be submitted in writing to the Managing Director except in the situation that the matter concerns the MD, then it should be submitted to the Company Secretary.

The written statement must include the following information:

- Description of the offence
 - Date on which the complainant became aware of the offence
 - Name of the person suspected of the offence
 - Actions taken (if applicable) before filing a complaint or allegation (i.e. talk to the supervisor)
1. The declaration must be sent in writing to **The Managing Director** by e-mail (feedback@microenterpriseplace.com) or by post (1A Kaltungo Road, Off Bauchi Road, Gombe). The complainant should expect to receive confirmation of receipt of the complaint within **two (2)** working days.
 2. The complainant will not be dismissed, demoted, suspended, threatened, harassed or otherwise discriminated against because of the communication of a genuine

concern. Any employee of **CMD** who contravenes this policy when dealing with a complainant may be terminated. Similarly, any member of the Board who violates this policy in his or her dealings with a complainant may have his or her relationship with **CMD** terminated.

3. A person is not required to prove the truth of an allegation but is required to act in good faith and provide sufficient evidence to the person contacted to demonstrate that there are sufficient grounds for concern. The number of contacts between the complainant and the investigative body will depend on the nature of the question and the clarity of the information provided. The investigating body may request additional information from the complainant.
4. All complaints will be treated in a confidential and sensitive manner. In addition, the complainant must be able to remain anonymous, except in cases where the nature of the disclosure and/or resulting investigation makes it necessary to disclose his or her identity (e. g. investigations or judicial proceedings). In such cases, all reasonable measures must be taken to protect the complainant from any prejudice resulting from a disclosure.

7 INVESTIGATION

All relevant cases, including suspicious but unproven cases, will be reviewed and analyzed by a competent person designated by **The Company Secretary**. In some cases, this may involve an investigation by a legal adviser or an accountant. All investigations will be kept confidential to the extent possible. Appropriate corrective action will be taken, if necessary, and the findings will be communicated to the whistleblower and his or her supervisor.

8 APPROVAL OF THE POLICY

Date of Approval by Company: 11th July 2025