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N.REA: PD 405881 - Cap. Soc.: 450.000,00 €

Whistleblowing Management Policy

Introduction

This Whistleblowing Policy provides guidance on how to raise concerns about malpractice in the conduct of individuals within and those representing FuturaSun. The Company is committed to being open, honest and accountable, and to conducting our business with the highest standards of integrity. The policy aims to ensure that if an individual wants to raise any serious concerns, they can do so with confidence and without having to worry about being victimised, discriminated against or disadvantaged in any way as a result.

The Administrative Board has oversight of the effective implementation of this policy and associated procedures and ensuring that everyone linked with FuturaSun is equipped and supported to meet their responsibilities.

Scope

This policy is mandatory for anyone who works for or on behalf of FuturaSun, either in a paid or unpaid capacity and this includes all directly employed staff, consultants, interns, secondees, junior professional officers (JPOs), and volunteers (referred to as "staff"), as well as FuturaSun Administrative Board members. This policy also applies to partners that FuturaSun funds should they not have their own Whistleblowing Policy.

Purpose

This policy is primarily for concerns or disclosures where the interest of others or of FuturaSun is at risk. Such concerns or disclosures are ones that the individual raising the concern reasonably believes that one or more of the following matters is either happening now, took place in the past, or is likely to happen in the future:

- criminal offences or unlawful acts
- bribery
- fraud, theft or corruption
- breach of a legal obligation
- abuse of position for any unauthorised reason or for personal gain
- professional misconduct, such as deliberate disregard for FuturaSun's policies and Code of Conduct
- discrimination against persons because of their race, colour, religion, ethnic or national origin, disability, age, sex, sexuality or class
- health and safety infringements
- safeguarding issues compromising the safety and wellbeing of vulnerable people
- unauthorised use of resources owned by FuturaSun or any of its contractors

- deliberate concealment of information tending to show any of the above matters

Concerns may be about members of staff, Board personnel, partners, suppliers or people who provide services to the public on our behalf.

The above list is of a few examples, but is by no means restricted to that list.
This policy cannot be invoked to:

- deal with matters that are covered by other procedures
- raise issues that have already been settled through other procedures.

Protection when raising a concern

Protection

The Administrative Board, Chief Executive Officer and Leadership team are committed to this policy. Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds to believe the information disclosed indicates a violation.

All whistleblowers will be treated in a fair way and not be harassed, bullied, victimised or prejudiced as a result of raising a genuine concern. It is contrary to the values of FuturaSun for anyone to retaliate against an individual who in good faith reports an ethics violation or a suspected violation of law or regulations that govern FuturaSun's operations.

FuturaSun will not reveal the whistleblower's identity without their prior permission, unless the Company must do so by law. If this is the case, this will be explained to the whistleblower at the time the concern is raised and/ or investigated to enable the individual to decide whether to proceed.

Anonymous Allegations

Because the whistleblowing individuals are protected, FuturaSun encourages that they give their name when making allegations or raising their concerns. Concerns raised anonymously tend to be far less effective especially where inadequate information is provided, limiting the Company's ability to investigate the matter fully.

If a whistleblower cannot provide their name, FuturaSun will decide whether to consider the matter dependent on whether it can carry out an investigation based on the information provided, the seriousness of the matter and whether the concern is credible.

Malicious Allegations

If an individual makes an allegation that they believe is true, but it is not confirmed by our investigation, FuturaSun will not take any action against the individual. However, if the individual makes a malicious allegation that they know is untrue, FuturaSun will take appropriate disciplinary or legal action against them.

Procedure for raising a concern

Any person who is aware of suspicions, allegations or actual wrongdoing by a staff, funded partner organisation, in any of the countries where FuturaSun operates, has an obligation to notify the FuturaSun Lead Human Resources.

The Lead HR is responsible for ensuring that all complaints about unethical or illegal conduct or safeguarding issues or others are investigated and resolved. All concerns should be presented in writing, and give as much information as possible – including any relevant names, dates, places, etc. The earlier a concern is raised, the easier it is to take effective action.

The Lead HR keeps a confidential record of all concerns raised and the outcomes of processes followed to resolve. The Lead HR will advise the Chief Executive Officer of all complaints received and the actions taken to address them. The Lead HR will keep the Sustainability Manager fully informed of all concerns and cases, providing a yearly summary of all cases raised, without revealing any specific details – except where allegations of fraud or corruption are found to be substantiated.

The Lead HR can be contacted directly via email at a.passuello@futurasun.it or by writing to: FuturaSun, via Riva del Pasubio 15 – 35013 Cittadella PD - Italy.

If a concern involves the HR Lead, or where the whistleblowing individual believes that the HR Lead may be biased, the matter should be referred directly to the Chief Executive Officer, providing justification for why the individual believes this is the case. External individuals raising concerns must do so through the HR Lead using the details above.

Contacting FuturaSun anonymously

FuturaSun has a specific email address that an individual can use to contact the Company confidentially (and anonymously should they wish) about any unethical / illegal conduct / safeguarding / whistleblowing issues: whistleblower@futurasun.it Only the HR Lead has access to this email.

Deciding whether to raise a concern

There are common feelings or experiences that can be barriers to raising a concern. For example, sometimes concerns are not raised because: it doesn't feel like one's business to do so; it is only a suspicion without hard evidence; it might feel disloyal to colleagues or the organisation; it did not go according to plan when it was raised previously, or other people had a poor experience of whistleblowing.

It is important to remember, however, that a whistleblower is a witness, not a complainant. The role of the whistleblower is to let the facts speak for themselves and to allow the responsible Officer to determine what action to take. FuturaSun would prefer the individual to raise matters sooner rather than waiting for proof – after all, it is important to consider the implications of not blowing the whistle too.

Responding to a concern

The way FuturaSun deals with a concern will depend on the nature of the concern.

Where applicable, FuturaSun's HR Lead 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.

The HR Lead will first make enquiries to decide whether an investigation should be carried out, and if so, how this should be done. The decision may be to hold an informal review, an internal inquiry or a more formal investigation. The concern may be investigated by the appropriate staff and dealt with, or may be referred to the following:

- the police or other statutory authority
- FuturaSun's external auditor
- an independent investigator

If the concern or allegation can be handled under any other FuturaSun's procedure or policy, the process will be followed.

If FuturaSun needs to take urgent action, this will be done before carrying out any investigation.

Should a meeting to discuss the concern be necessary, the whistleblowing individual can be accompanied by a friend, colleague or other representative in whom they have confidence and who understands clearly the need for utmost confidentiality.

The whistleblowing individual will be given as much feedback as is appropriate during the process and in respect of the outcome. However, FuturaSun may not be able to tell the individual about the precise actions taken where this would infringe a duty of confidence FuturaSun owes to another person.

Upon the conclusion of the investigation, the whistleblower may be asked for their opinion on how well they feel their concern was handled.

Where allegations are made, FuturaSun will take careful consideration about the appropriateness of the person continuing to work with or for FuturaSun. FuturaSun will apply appropriate disciplinary measures to staff in breach of policy.

Some funders require that FuturaSun informs them of any Whistleblowing allegations. FuturaSun commits to disclose to funding partners who request to be informed, any Whistleblowing allegations, whether proven or not. The concern, having been registered in the Whistleblowing Incident Register will also be immediately disclosed to those funder(s). Sample Incident Register is attached as Appendix 1.

Response Timing

Where the concern is not anonymous, the Lead HR will contact the complainant to record the details of the complaint and acknowledge the complaint in writing within 5 working days.

The Lead HR will provide a final written response to the complainant within a maximum of 28 working days setting out the findings of any investigation or inquiry, and how FuturaSun has addressed the issue/s. If FuturaSun is unable to complete within this timescale, due to further investigations, the complainant should be contacted and informed of how long it will take to resolve the issue. This may be extended to a maximum of 65 working days. The complainant should be informed of the reasons for the delay and a date for completion. Similar response times will be followed for complaints that are not anonymous.

Reprisal

FuturaSun will not tolerate any form of harassment, bullying, victimisation, coercion, intimidation, reprisal or retaliation or prejudice against anyone who whistleblows, or provides any information or other assistance in a raised concern or an investigation. Any such behaviour may be treated as a disciplinary offence.

FuturaSun responsibilities

FuturaSun will:

- ensure all staff have access to, are familiar with, and know their responsibilities within this policy
- ensure that staff are inducted in our Whistleblowing Policy as a key part of the recruitment and on boarding process
- ensure that all partners are informed and in compliance with our Whistleblowing Policy
- follow up on whistleblowing reports promptly and take action.

Working with partner organisations

FuturaSun delivers its programmes and activities in partnership, and in some instances may fund partners. If the funded partner organisation does not have an appropriate similar policy in place, then FuturaSun's Whistleblowing Policy takes the precedent.

Funded partners commit to ensuring that all cases of suspected and/or alleged whistleblowing incidents which relate to FuturaSun are reported at the earliest opportunity to the leadership team member they are working with, or the Lead HR. Partners will provide FuturaSun with all relevant or requested information to enable an appropriate investigative response.

Data Protection and confidentiality

It is essential that confidentiality is maintained at all stages of the process when dealing with whistleblowing. All sensitive and personal data must be kept confidential (including the names of anyone who makes the report), and be shared on a strictly 'need to know basis', that is, access must be necessary for the conduct of one's official duties.

Monitoring of this Policy

FuturaSun commits to monitoring the implementation of the Whistleblowing Policy to ensure its effective application. The FuturaSun annual audit process will be used as a tool to identify any compliance and reporting issues in all offices. The HR Lead will keep the Chief Executive Officer fully informed of all concerns and cases relating to whistleblowing. This policy will be reviewed every three years and earlier if necessary, especially after any whistleblowing.

Appendix 1: Whistleblowing Incident Register

This form is used to record a single allegation as soon as it is received, whether proven or not. The Lead HR will use this information to record into the overall Organisational Incidents Register which incorporates and reports on other policy related incidents for reporting to the CEO.

Summarise Whistleblowing Incident Type:	
Date Incident Reported:	
Complainant's Name (person reporting – indicate anonymous if applicable)	
Victim's Name (if applicable)	
How was the issue reported (e.g. email, hard copy report)	
Describe the issue in detail as presented by the complainant	
Explain how the issue was managed - the key steps that were followed.	
What was the outcome & include the date of the resolution	
Has the Whistleblowing procedure worked well? Is there need to revise the Whistleblowing Policy & procedure? Explain.	
Any additional comments	

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