

NATIONAL AIDS COUNCIL



WHISTLEBLOWING AND NON-RETALIATION POLICY

MANDATE

To provide for measures to combat the spread of Human Immunodeficiency Virus (HIV) and management, co-ordination and implementation of programmes that reduce the impact of HIV and AIDS

VISION

A Zimbabwe free from HIV infections, stigma and AIDS related deaths by 2030

MISSION

To lead and coordinate the national strategy in response to HIV and AIDS in Zimbabwe

Core Values

Transparency

Accountability

Innovation

Teamwork

Integrity

Professionalism

Inclusiveness

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GENERAL POLICY STATEMENT

- 1.1. National AIDS Council is committed to conduct its business in accordance with its mandate and core values. Towards this end all employees of the Council shall endeavor to maintain a culture of good Corporate Governance by observing Integrity in all their transactions among themselves and with the partners and clients.
- 1.2. This Whistleblowing and Non-Retaliation Policy exemplifies National AIDS Council's firm commitment by providing a mechanism for reporting perceived and actual irregularities that are contrary to National AIDS Council's Mandate and Core Values while providing appropriate protection for whistleblowers from possible retaliation.

PURPOSE

This Anti- retaliation policy has been developed to formally ensure that all employees feel comfortable speaking up when they see or suspect illegal or unethical conduct without fear of retaliation. It is also intended to encourage all employees to cooperate with National AIDS Council in the internal investigation of any matter by providing honest, truthful and complete information without fear of retaliation.

SCOPE

This Anti retaliation policy shall apply to all prospective, former and current employees of the National AIDS Council.

DEFINITION OF TERMS

- 4.1. **Good faith report** - Disclosure of National AIDS Council related misconduct made with a belief in the truth of the report which a reasonable person in the reporter's position could hold based upon the facts.

- 4.2. **Bad Faith Report** – Providing information, knowing that such information is not true or made without a reasonable belief in the truth of the allegation based upon the facts.
- 4.3. **Retaliation/Retaliate** - Any Adverse Action taken against an employee or any other member because he/she has, in Good Faith, reported Wrongdoing or has, in Good Faith, cooperated in/with an institutional investigation.
- 4.4. **Whistleblower** - is a person who exposes any kind of information or activity that is deemed illegal, unethical, or not correct within National AIDS Council. The information of alleged wrongdoing can be violation of company policy/rules, law, regulation, or threat to public interest/national security, as well as fraud, and corruption.

PHILOSOPHY

- 5.1. National AIDS Council shall maintain the confidentiality of whistle blowers by all means possible. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law and to provide accused individuals their legal rights of defense.
- 5.2. National AIDS Council prohibits any form of retaliation such as being discharged, demoted, suspended, threatened, harassed, intimidated, coerced, or retaliated against in any other manner as a result of his or her making a good faith complaint or assisting in the handling or investigation of a good faith complaint, that a National AIDS Council Policy, the Code of Conduct, or an applicable law, rule or regulation has been violated. Employees who in good faith make a complaint or participate in an investigation or proceeding under this policy, however, remain subject to the same standards of performance and conduct as other employees.

- 5.3. National AIDS Council prohibits employees from being retaliated against even if their complaints are proven unfounded by an investigation, unless the employee acted in bad faith.
- 5.4. A Whistleblower who acts in "bad faith" and is found to have made intentional malicious and false allegations shall be subject to appropriate disciplinary or legal action pursuant to the NAC Code of Conduct and any applicable laws or regulations.

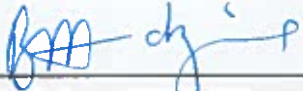
6. WHISTLE BLOWING

- 6.1. Known or suspected violations must be reported promptly. Reports of known or suspected Violations should contain as much factual information as possible. To the extent possible, reports should include the names of the suspected wrongdoers, a description of the misconduct (including any supporting documentation or facts) and an explanation about how the reporting individual learned of the misconduct.
- 6.2. The Council provides multiple avenues for whistle blowing. Whistle blowers may submit confidential information to the Office of the Human Resources, Chief Executive Officer and or Board Chairperson depending on the nature of the misconduct and level of officials involved.
- 6.3. Whistleblowers are required to identify themselves when reporting. All reports submitted by an anonymous whistleblower shall not be considered a valid Whistleblower report unless the Whistleblower agrees to identify himself / herself.

7. REPORTING VIOLATIONS

- 7.1. If any member believes that he/she has been subjected to any action that violates the non-Retaliation provisions of this policy, he/she may file a complaint with the Office of the Human Resources, Chief Executive Officer and or Board Chairperson depending on the nature of the misconduct and level of officials involved.
- 7.2. National AIDS Council takes all complaints of retaliation very seriously. All such complaints will be reviewed promptly and, where appropriate, investigated and referred to the NAC Code of Conduct and Grievance Procedures.

Signed



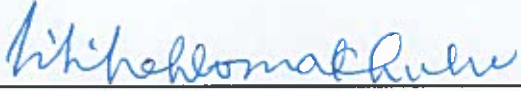
Dr. B. Madzima (Chief Executive Officer)

31/08/23

Date

And Confirmed by Board Chairperson (for and on behalf of National AIDS Council).

On this 31st day of August, **2023.**

Signature 

Board Chairperson (Mrs. M.N. Mehlomakhulu)