

Whistleblower Policy

New Horizons Enrichment and Education Ltd

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| Last updated | 19.02.2021 |
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Definitions

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| Organization | means New Horizons Enrichment and Education Ltd |
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| Responsible Person | means Kelly Marie Lawson, director of New Horizons Enrichment and Education Ltd. |
| Register of Systems | means a register of all systems or contexts in which personal data is processed by the Company. |

This policy is intended to encourage Board members, staff (paid and volunteer) and others to report suspected or actual occurrence(s) of illegal, unethical or inappropriate events (behaviors or practices) without retribution.

- 1. The Whistleblower should promptly report the suspected or actual event to his/hersupervisor.**
- 2. If the Whistleblower would be uncomfortable or otherwise reluctant to report to his/her supervisor, then the Whistleblower could report the event to the next highest or another level of management, including to an appropriate Board committee or member.**
- 3. The Whistleblower can report the event with his/her identity or anonymously.**
- 4. The Whistle blower shall receive no retaliation or retribution for a report that was provided in good faith – that was not done primarily with malice to damage another or the organization.**
- 5. A Whistleblower who makes a report that is not done in good faith is subject to discipline, including termination of the Board or employee relationship, or other legal means to protect the reputation of the organization and members of its Board and staff.**
- 6. Anyone who retaliates against the Whistleblower (who reported an event in good faith)**

will be subject to discipline, including termination of Board or employee status.

7. Crimes against person or property, such as assault, rape, burglary, etc., should immediately be reported to local law enforcement personnel.

8. Supervisors, managers and/or Board members who receive the reports must promptly act to investigate and/or resolve the issue.

9. The Whistleblower shall receive a report within five business days of the initial report, regarding the investigation, disposition or resolution of the issue.

10. If the investigation of a report, that was done in good faith and investigated by internal personnel, is not to the Whistleblower's satisfaction, then he/she has the right to report the event to the appropriate legal or investigative agency.

11. The identity of the Whistleblower, if known, shall remain confidential to those persons directly involved in applying this policy, unless the issue requires investigation by law enforcement, in which case members of the organization are subject to subpoena

END OF POLICY