CORPORATE POLICY

Whistleblowing (Speak Up) Policy

EFFECTIVE DATE	VERSION	NEXT REVIEW
11 August 2026	1.0	12 months after approval

POLICY OWNER	APPROVED BY
Compliance Officer	Board of Directors, [date]

APPLIES TO
Personnel, subcontractor and supplier workers, community members and anyone else with a concern

01 Purpose

Problems on construction sites are usually seen first by the people closest to the work: a labourer who notices an unsafe trench, a storekeeper who sees cement leaving the site, a community member who is harassed. Boafo Nsa wants to hear about these early. This policy explains how to raise a concern safely and what will happen next.

02 What can be reported

- Bribery, fraud, theft of materials or fuel, false measurements or certificates
- Serious safety hazards, unreported accidents or pressure to work unsafely
- Use of substandard materials or concealment of defects
- Pollution, illegal dumping or sand winning, or breach of an environmental permit
- Harassment, sexual exploitation or abuse, discrimination, child labour or forced labour
- Retaliation against someone who raised a concern
- Any breach of law or of the policies in this library

Personal employment grievances (pay, leave, shift allocation) should normally go through the HR grievance procedure. Community complaints about dust, noise or damage should go to the Community Grievance Mechanism (BN-POL-13), although they may also be raised here.

03 How to report

CHANNEL	DETAILS
Your supervisor or project manager	In person, unless they are involved
Compliance Officer	[phone]
Ethics email	[ethics@boafonsa.com]
Phone or WhatsApp line	[number], voice notes accepted in any language
Board chair	For concerns about senior management
External	Office of the Special Prosecutor, CHRAJ, or the client's or lender's complaint channel

Reports may be made anonymously. Giving a way to contact you, even an anonymous email, helps investigation.

04 Protection

The Whistleblower Act, 2006 (Act 720) protects people who disclose wrongdoing in good faith. Boafo Nsa goes further: no one will be dismissed, demoted, refused work, moved to a worse site, threatened or harassed for raising a concern in good faith, even if it turns out to be mistaken. Retaliation is gross misconduct. Deliberately false reports are also a disciplinary matter.

05 Confidentiality

The identity of the reporter is shared only with those who need it to investigate, and only with consent unless the law requires otherwise. Records are kept securely under BN-POL-15.

06 What happens next

01 Acknowledgement within 5 working days

02 Initial assessment and, where needed, immediate action to stop danger or harm

03 Investigation by a person independent of the matter; SEAH reports follow the survivor-centred process in BN-POL-12

04 Feedback to the reporter on the outcome, as far as confidentiality allows, normally within 60 days

05 Corrective action, discipline or referral to the authorities

07 Oversight

The Compliance Officer keeps a confidential register of reports and reports anonymised statistics and trends to the Board at least twice a year. This policy is reviewed at least every 12 months.

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