



WHISTLEBLOWING POLICY

Document Control

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Approved by	Board of Directors
Policy Owner	Compliance & Risk Office
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Version History

Version	Date	Description	Approved By
1.0	14/10/2019	Initial Whistleblowing Policy	Board of Directors
2.0	27/02/2026	Expanded reporting, anti-retaliation, investigation and	Board of Directors



		governance framework	
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1. Purpose

The purpose of this Policy is to provide a safe, confidential and accessible mechanism for employees, directors, consultants, suppliers, partners, contractors, farmers, MSMEs and other stakeholders to report suspected misconduct involving The Aquaculture Consortium Limited (“TAC”).

TAC is committed to integrity, accountability, transparency and responsible business conduct. Any person who raises a genuine concern in good faith should be able to do so without fear of retaliation, intimidation, discrimination, victimisation or unfair treatment.

This Policy also supports TAC’s commitment to ethical business conduct, ESG principles, safeguarding, donor and investor compliance expectations, AML/CFT obligations, anti-fraud controls and institutional governance.

2. Scope

This Policy applies to concerns involving:

- Directors, board members, employees, consultants, interns and contracted personnel;
- Suppliers, contractors, agents, service providers and partners;
- Portfolio enterprises, subsidiaries, branches and affiliated operations where applicable;
- Customers, farmers, MSMEs, fisherfolk, community actors and other stakeholders interacting with TAC;
- Physical, digital and electronic activities connected to TAC operations.

All persons covered by this Policy are encouraged to report concerns responsibly and in good faith.

3. Matters That Can Be Reported

Whistleblowing concerns may include, but are not limited to:





- Fraud, bribery, corruption, kickbacks or facilitation payments;
- Theft, misuse or misappropriation of company funds, assets or resources;
- Money laundering, terrorism financing, sanctions breaches or suspicious transactions;
- Falsification of financial records, procurement records, reports, data or impact metrics;
- Conflicts of interest or undisclosed related-party dealings;
- Abuse of position or authority;
- Harassment, discrimination, exploitation or unsafe conduct;
- Sexual exploitation, abuse or harassment;
- Child safeguarding or community safeguarding concerns;
- Breach of data protection, cybersecurity or confidentiality obligations;
- Environmental, health, safety or food safety violations;
- Retaliation against a person who has raised a concern;
- Cyber-enabled fraud, phishing or digital payment manipulation;
- Any breach of law, company policy, donor/investor requirements or ethical standards.

This Policy is not intended for ordinary employment grievances unless the matter involves misconduct, illegality, abuse of authority, safeguarding concerns, financial risk or public-interest concerns.

4. Policy Statement

TAC encourages the reporting of genuine concerns as early as possible.

Reports made in good faith shall be:

- Taken seriously;
- Reviewed fairly and objectively;
- Treated confidentially as far as reasonably possible;
- Escalated appropriately where necessary;
- Managed in a manner that protects affected persons and institutional integrity.

TAC prohibits retaliation against any person who:

- Raises a concern in good faith;
- Assists in an investigation;
- Refuses to participate in misconduct;
- Cooperates with a review, audit or inquiry.



5. Reporting Channels

Concerns may be reported through TAC's designated reporting channels.

Designated Reporting Contact

Compliance Officer / Compliance & Risk Office

Email: compliance@aquacultureconsortium.com

Alternatively, concerns may be reported to:

- Group CEO;
- Board Chairperson;
- Money Laundering Reporting Officer;
- HR/Admin Lead;
- Any trusted senior manager;
- Designated safeguarding focal persons where appropriate.

Where the concern involves one of the above persons, the report should be made to another appropriate senior officer or Board representative.

Concerns should be escalated promptly and, where practicable, within 24–72 hours of identification.

6. Information to Include in a Report

Where possible, a report should include:

- Description of the concern;
- Names of persons involved;
- Date, time and location of the incident;
- Relevant documents, messages, invoices, payments or evidence;
- Names of possible witnesses;
- Whether the matter is ongoing;
- Any immediate risk to people, funds, assets, systems, data or operations.

A person reporting a concern does not need to prove wrongdoing. A reasonable suspicion made in good faith is sufficient.



7. Anonymous Reporting

TAC permits anonymous reporting where a person is uncomfortable identifying themselves.

However, anonymous reports should provide enough information to allow TAC to assess and investigate the concern appropriately.

Where insufficient detail is provided, TAC may be unable to take effective action.

8. Confidentiality

TAC shall keep whistleblowing reports confidential to the extent reasonably possible.

The identity of a person making a report shall not be disclosed unless:

- The person consents;
- Disclosure is required by law or competent authority;
- Disclosure is necessary to investigate the matter fairly;
- There is a serious risk to people, assets, operations or public interest.

All persons involved in receiving, reviewing or investigating a report must maintain confidentiality.

Records containing personal or confidential information must be managed in line with TAC's Data Protection & Privacy Policy and Records Retention Policy.

9. Protection Against Retaliation

TAC prohibits retaliation against any person who raises a concern in good faith.

Retaliation may include:

- Dismissal, demotion or suspension;
 - Harassment, intimidation or threats;
 - Discrimination or unfair treatment;
 - Loss of business opportunity;
 - Negative performance treatment;
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- Blacklisting or exclusion;
- Victimization or reputational harm;
- Any action intended to punish or discourage reporting.

No employee, consultant, supplier, partner or stakeholder acting in good faith shall suffer retaliation for reporting concerns.

Any person found to have retaliated against a whistleblower may face disciplinary action, termination of employment or contract, removal from duties or other appropriate consequences.

10. Handling and Investigation of Reports

Upon receiving a report, TAC shall:

1. Acknowledge receipt where possible;
2. Record the concern securely;
3. Conduct an initial assessment;
4. Determine whether investigation is required;
5. Assign an appropriate person or team to review the matter;
6. Take steps to protect people, records, assets, systems and evidence;
7. Document findings and recommended action;
8. Escalate serious matters to management, the Board, regulators, law enforcement, donors or investors where appropriate.

Investigations shall be conducted fairly, objectively and without unnecessary delay.

The Compliance Officer may escalate material concerns directly to senior management or the Board where appropriate.

11. False or Malicious Reports

TAC recognises that concerns may be raised even where facts are incomplete or uncertain.

No action shall be taken against a person who makes a report in good faith, even where the concern is not ultimately proven.



However, knowingly false, malicious or bad-faith reports may result in corrective or disciplinary action.

12. Record Keeping

TAC shall maintain secure records of whistleblowing reports, investigations, findings and actions taken.

Records shall be:

- Retained in line with TAC's Records Retention Policy;
- Protected from unauthorised access or disclosure;
- Accessible only to authorised persons;
- Managed securely and confidentially.

13. Reporting to External Authorities

Where required by law or where the matter involves serious misconduct, criminal activity, safeguarding risk, financial crime, public safety, regulatory breach or other significant concern, TAC may report the matter to relevant authorities.

Authorities may include:

- Financial Reporting Centre;
- Law enforcement agencies;
- Regulators;
- Anti-corruption authorities;
- Labour authorities;
- Data protection authorities;
- Investors or donors;
- Child protection or safeguarding authorities;
- Other competent bodies depending on the nature of the concern.

14. Awareness and Communication

TAC shall make this Policy available to relevant employees, directors, consultants, suppliers, partners and stakeholders.





TAC may provide awareness and sensitisation on:

- Ethical conduct and reporting obligations;
- AML/CFT and anti-fraud reporting;
- Safeguarding and PSEAH reporting;
- Cyber fraud awareness;
- Protection available to whistleblowers;
- Confidentiality obligations;
- Reporting channels and escalation procedures.

15. Monitoring and Oversight

The Board and Management are responsible for oversight of this Policy.

The Compliance Officer or designated responsible officer shall support implementation, reporting management, awareness, record keeping and monitoring of whistleblowing obligations.


TAC may periodically review whistleblowing trends, controls and escalation mechanisms to strengthen institutional governance and risk management.

16. Review

This Policy shall be reviewed at least annually or earlier where required by changes in law, operations, governance needs, investor/donor requirements or identified risks.

17. Approval

This Policy has been approved by the Board of Directors of The Aquaculture Consortium Limited.

Name	Position	Signature	Date
Felix Omondi Osok	Board Chair		27/02/2026



Appendix A : Examples of Reportable Concerns

Examples include:

- Fraud or corruption;
- Procurement irregularities;
- Conflicts of interest;
- Safeguarding concerns;
- Financial misconduct;
- Cyber fraud or phishing;
- Data breaches;
- Abuse of authority;
- Harassment or retaliation;
- Environmental or safety violations.

Appendix B : Whistleblowing Escalation Flow

1. Concern identified.
2. Report submitted through designated channel.
3. Initial assessment conducted.
4. Investigation or review initiated.
5. Escalation to management, Board or authorities where necessary.
6. Corrective action and monitoring implemented.

Appendix C : Good Reporting Practices

Persons raising concerns should:

- Report concerns promptly;
- Provide available supporting information;
- Maintain confidentiality where appropriate;
- Avoid knowingly false allegations;
- Cooperate with investigations where required.