

FIJI NATIONAL PROVIDENT FUND
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WHISTLE BLOWER POLICY



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1.0 Objective

The Fiji National Provident Fund (“the Fund”) is committed to its strategic goal of practising good governance and promoting honesty in all its dealings. This policy provides the guidelines by which staff can confidentially report breaches of policies, fraud or behaviours that are inconsistent with the Fund’s overarching practice of good corporate governance.

2.0 Scope

This policy shall apply to FNPF staff and management and the Board.

3.0 Policy Statements

3.1 General

- 3.1.1 It is the responsibility of every employee of the Fund to confidentially report any fraud, auditing and accounting irregularities, corrupt conduct, mal-administration or serious and substantial waste of the Fund’s resources, including inappropriate behaviour and conduct of staff or management of the Fund.
- 3.1.2 Deliberate failure by an employee to disclose any of the instances or actions referred in 3.1.1 is a breach under this policy and may result in disciplinary action.
- 3.1.3 In relation to 3.1.1, to the extent possible within the limitations of law and policy and the need to conduct a competent investigation, the Fund will keep the identity of those disclosing information confidential and not release any information that might identify the persons.
- 3.1.4 Any staff making a disclosure under this policy will not be victimised in anyway provided he/she acts in good faith. Staff can raise their concerns in writing or orally.
- 3.1.5 **No retaliation** – An employee who retaliates against someone who has reported a complaint in good faith will be disciplined in accordance with the FNPF staff disciplinary procedures.



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- 3.1.6 Any direct or indirect use of authority to obstruct an individual's right to make a genuine disclosure is prohibited under this policy. Anyone in breach of this clause will be subject to disciplinary action as in 3.1.4 above.
- 3.1.7 Disclosures made by individuals under this policy may be based on first hand factual information or knowledge based on reasonable grounds. Individuals who want to be anonymous should provide sufficient facts to enable management to look into the matter without their assistance.
- 3.1.8 We do not encourage disclosures based on rumours. Any malicious, knowingly false or unsubstantiated allegations will be viewed seriously and may result in disciplinary action.
- 3.1.9 The purpose of whistle blowing is primarily to protect the interest and the integrity of the Fund and its stakeholders. Personal complaints or grievances should be reported and addressed through the normal grievance procedure in accordance with the Staff Code of Conduct.

3.2 Disclosure Process

- 3.2.1 Confidential disclosures under this policy should be made to the Manager Internal Audit. The CEO will also be consulted by the Manager Internal Audit.
- 3.2.2 Any disclosure under this policy against a member of Internal Audit Department is to be reported to the Chairman of the Audit Sub-Committee after the Chief Executive officer has been advised of the report.

(hereinafter referred to as "Authorities")

- 3.2.3 In relation to 3.2.1, a notice may be provided anonymously in writing, by telephone or in person. An employee has the liberty to have his/her identity known to the authorities.
- 3.2.4 Manager Internal Audit will then initiate a proper investigation to be carried out with consultation with the Chief Executive Officer.
- 3.2.5 All matters raised under this policy will be properly assessed and fully investigated (where necessary) and those involved will be formally advised of the outcome. The matters will be handled according to principles of natural justice.



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- 3.2.6 The appropriate management authority will discuss with the staff disclosing the matter (if the staff's identity is known) the way in which the matter will be progressed and/or communicated.
- 3.2.7 The Fund may accept and investigate disclosures made by FNPF members, customers, suppliers, contractors, consultants or any other stakeholder. Such disclosures will be received and handled by the Manager Internal Audit in consultation with the Chief Executive Officer.

3.3 Record Keeping

- 3.3.1 All disclosures made under this policy shall be recorded in a register maintained by the Manager Internal Audit. The details recorded in the register shall include:
- (a) Date complaint received
 - (b) Name of person raising the concern (if the person's identity is known)
 - (c) Nature of the complaint
 - (d) Name of person reported to
 - (e) Action taken to resolve the matter
 - (f) Date matter closed
- 3.3.2 The Fund will take all necessary steps to ensure confidentiality of the information received from the staff and from the investigation carried out on the disclosure. However, a situation may arise where it will not be possible to resolve the matter without revealing the employee's identity e.g. where the employee may be required to give evidence in court.

4.0 Sanctions

A breach under this policy by staff and management may result in disciplinary action as stipulated under the FNPF staff disciplinary procedures.

5.0 Effective Date

This policy was approved by the Board on 07/12/2007 and becomes effective immediately.



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Annexure 1: Additional Notes to the Whistle Blower Policy

- 1.0 Whistle Blowing** – Is a process established to encourage and enable employees and others to raise serious concerns within an organization prior to seeking resolution outside.
- 2.0 Unethical Behavior** includes but not limited to:
- (a) Fraud, theft or misappropriation.
 - (b) Use of inside information by an employee for private gain.
 - (c) Giving or receiving of bribes, gifts, benefits or any thing of value which would impair objectivity in the performance of an employee's responsibilities.
 - (d) Inappropriate disclosure of FNPF's confidential information (including intellectual property).
 - (e) Engaging in activities that compromise or are potentially in conflict with the interests of the Fund.
 - (f) Breach of FNPF policies.
 - (g) Any illegal act.
- 3.0 Genuine Disclosure** – A genuine disclosure under this policy refers to any good faith communication that discloses information that may evidence improper activity.