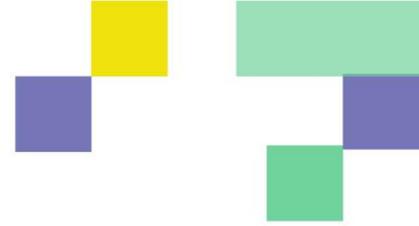




FOUNDATION FOR
GLOBAL PARTNERSHIP
FOR EDUCATION

Whistleblowing policy

Version 01



Whistleblowing policy

Approval date: 29 October 2025

Policy owner: Foundation Board

Policy supervisor: Designated Ethics Officer

This policy becomes effective from the date of Foundation Board's approval and shall be immediately implemented from the approval date. This policy shall be reviewed and updated, as necessary, to ensure alignment with international best practices and the Swiss legal framework.

If you have a concern about inappropriate behaviour perpetrated by a Foundation for GPE Governance Official or Foundation for GPE staff, please contact ethics@foundationforgepe.org.

1. Introduction

As enshrined in the Foundation Statutes (art. 4.), the sole purpose of the Foundation for Global Partnership for Education (hereinafter "Foundation" or "Foundation for GPE") is to support the mission, vision, goals and objectives of the Global Partnership for Education (hereinafter "GPE") as updated in its periodic strategic plans from time to time.

GPE is the largest global fund solely dedicated to transforming education in low and lower-middle income countries, and a unique, multi-stakeholder partnership. It works to deliver quality education so that every girl and boy can have hope, opportunity, and agency. GPE brings together partner and donor countries, multilateral agencies and nongovernmental organizations (including international and local CSOs), representatives of the teaching profession, the private sector and foundations supporting the education sector in partner countries.

The Foundation recognizes that to fulfil its purpose, there is a need to involve many stakeholders. The Foundation recognizes that many of its stakeholders are subject to potential misbehaviours. Implementation by all Foundation stakeholders of effective good governance helps to foster an environment intolerant of practices leading to misbehaviours.

As set out in this policy, a transparent and objective process will help to protect the reputation and integrity of the Foundation and to promote broad public trust in the Foundation's activities. The Foundation expects this policy will continue to be adhered to by all involved parties. Whenever possible, this policy shall be interpreted to be consistent with relevant laws, regulations and other applicable policies.



2. Purpose and scope

2.1 Purpose

The purpose of this policy is to ensure a clear, achievable and relevant standard of ethical conduct for the activities and decision-making of the Foundation, as a good practice that will help protect all Foundation Stakeholders and foster broad public trust and confidence in the Foundation's operations.

This policy outlines both expectations and requirements for the Foundation Stakeholder involved in the implementation of the Foundation's activities to prevent and manage the risk of misbehaviour incidents in the delivery of the Foundation's activities. This policy constitutes guidance which is a set of principles and rules that Foundation Stakeholders are expected to apply unless they can provide an acceptable rationale for not doing so. Preventing misbehaviours is a shared responsibility. All involved parties must play an active role in reporting and addressing misbehaviour incidents as they occur.

This policy should be interpreted to be consistent with other Foundation policies as well as any other applicable rule. Abiding by this policy does not relieve the Foundation Stakeholders from abiding by other policies and regulations that they have professionally committed to.

For the execution of this policy, the Foundation Board will delegate to the Foundation Designated Ethics Officer the reporting and case handling mechanisms. Should the Designated Ethics Officer be a party concerned, the responsibility shifts over to the Foundation Chair of the Board. Should the Chair and the Designated Ethics Officer be both concerned, or in any other case of dissatisfaction with this internal process, an escalation mechanism with the support of GPE will be sought after to avoid any deadlock.

2.2 Scope

This policy applies to the Foundation staff, to the Foundation Governance Officials and to the Foundation Partners (the "Foundation Stakeholders").

a. Foundation staff includes:

- Employees of the Foundation;
- Consultants, contractors and agents working for the Foundation;
- Seconded staff;
- Volunteers and interns.

b. Foundation Governance Officials refers to members of the Foundation Board and its potential Committees. In addition to this policy, all Governance Officials are also expected to abide by the Foundation Code of Conduct for Governance Officials.

c. The Foundation partner organizations involved in the implementation of the Foundation contributions ("Foundation Partners") are expected to act in accordance with the principles and reporting requirements outlined within this policy. They must also abide by their own relevant policies, as well as applicable international declarations, conventions, agreements and standards that relate to this policy.

3. Whistleblowing principles

3.1 Whistleblowing

A whistleblower is a person making a report in good faith to someone in authority about misconduct behaviour. By reporting misconduct in the Foundation, the whistleblower alerts the organisation to the fact that its stakeholders are being wrongfully put at risk or have been, or are being, harmed. These whistleblowing guidelines are put in place to make the procedure of whistleblowing transparent and to eliminate any doubts concerning the effectiveness of reporting misconduct. They illustrate appropriate action to take when experiencing or discovering any violation of a law or regulation, or that constitutes fraudulent accounting or other practice that do not comply with the Foundation's policies, and notably the Foundation Ethical Code of Conduct and the Foundation PSEAH and Children safeguarding policy.

3.2 Guiding principles for handling complaints

The following principles will underpin reporting and case handling.

Principle 1: Confidentiality

The Foundation understands the importance of maintaining confidentiality at all stages of the process when dealing with safeguarding concerns. Confidentiality is critical to a satisfactory outcome to protect the privacy and safety of all concerned. Information relating to the concern and subsequent case handling of that concern should be shared on a need-to-know basis only and should always be kept secure. Breach of confidentiality, for anything other than appropriate case management/handling/legal obligation or for whistleblowing purposes where an individual feels that the case has not been handled adequately through internal mechanisms and where whistleblowing is necessary to avoid:

- i. a significant threat to public health or safety;
- ii. or a substantive damage to the Foundation operations;
- iii. or a violation of national or international law;

is a breach of this policy.

The Foundation provides the opportunity to treat all whistleblowing reports as either confidential or anonymous. The choice between a confidential or an anonymous report is the sole decision of the whistleblower. If further investigation is required after an anonymous report, all exchanges will ensure that anonymity can be preserved in the dialogue between the Designated Ethics Officer and the whistleblower

Principle 2: Responsiveness

Each complaint which falls within the scope of this policy is acknowledged in alignment with the agreed Foundation response timeframe as outlined in this policy.

Principle 3: Non-retaliation

Retaliation refers to any direct or indirect detrimental action that adversely affects the employment or working

conditions of an individual, where such action has been recommended, threatened or taken for the purpose of punishing, intimidating or injuring an individual because of a complaint submitted in good faith. It is the right of all stakeholders to complain. In case of retaliation, the whistleblower should report the facts as soon as possible in order to receive protection through the implementation of appropriate measures (e.g. a temporary reassignment with the consent of the whistleblower subject of retaliation). Any attempt of retaliation against a complainant is considered misconduct and a breach of this policy. Retaliators will be subject to administrative and/or disciplinary action.

Principle 4: Objectivity

Every complaint is addressed in an impartial, equitable and objective manner.

Principle 5: Safety and Welfare

The safety of the complainant, alleged victim or survivor, witnesses, alleged subject of concern and staff is paramount.

4. Roles and responsibilities

4.1 Foundation Board

The Foundation Board, as the policy owner, is responsible for ensuring that this policy is, and continues to be, fit for purpose by approving the Whistleblower policy and subsequent revisions. The Foundation Board is also responsible for ensuring effective implementation of this policy.

The Foundation Governance Officials shall demonstrate their commitment to the creation of a safe work environment and the prevention of misbehaviour, educate themselves on the issue, and act as role models by maintaining a high standard of personal conduct with consciousness of the power their position holds and treat all colleagues with dignity and respect.

The Foundation Board will nominate a Designated Ethics Officer in charge of the reporting and case handling mechanisms.

4.2 Foundation staff

The staff will be responsible for coordinating communication to the Foundation Designated Ethics Officer on credible misbehaviour incidents and shall communicate information to the Foundation Designated Ethics Officer in accordance with this policy.

The Foundation staff shall develop and share guidance and approaches to assist in selection, design and implementation of good practice, as a means to contribute to risk mitigation.

On an annual basis, the Secretariat shall prepare a paper for consideration by the Board of the lessons learned from the findings of the Foundation policies, if any, over the previous year. Such reports shall include recommendations based on the lessons learned.

The Designated Ethics Officer shall ensure that appropriate misbehaviour considerations are embedded in the

recruitment process and that staff receive relevant training on an ongoing basis.

The Designated Ethics Officer will ensure that the Whistleblower policy is discussed regularly by the Foundation staff.

The Foundation staff are expected to provide any support necessary to facilitate timely and satisfactory management of misbehaviour incidents. The Foundation staff do not have investigative capacity or authority and shall not conduct investigations, unless agreed otherwise by the Foundation Board.

4.3 Foundation Partners

The Foundations Partners have primary responsibility for investigating misbehaviour incidents within Foundation-funded programs, in accordance with their own internal policies and procedures.

The Foundation Partners implementing programs supported by the Foundation shall have a strong system of internal controls to prevent and manage the risk of misbehaviour incidents, and notably with regards to Children and misuse of funds.

The Foundation Partners shall report to the Foundation Board any misbehaviour incidents and measures taken or planned to protect and prevent misbehaviour incidents.

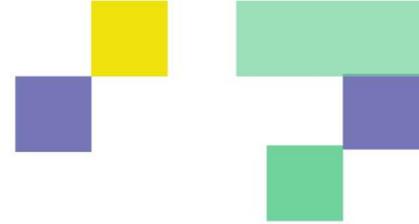
As part of the quality assurance review process for grants, the Foundation will verify that Foundation Partners have followed their own policies and procedures to consider Whistleblowing.

5. Reporting and case handling mechanisms

- The Foundation Stakeholders who suspect, or may be aware of, violations of any Foundation policy should bring them to the attention of the Foundation Designated Ethics Officer who will inform the Foundation Board of all relevant cases. The Designated Ethics Officer will also inform the GPE CEO of any allegation that may entail a reputation risk for the GPE.
- Reports of misbehaviour incidents can be submitted by any person and against any person, irrespective of whether such persons have any contractual status with the Foundation.
- It is essential that information is reported as soon as possible regarding any credible misbehaviour incident. Early disclosure enables relevant persons to act swiftly in response to information on misbehaviour and be prepared for further enquiries from stakeholders. Please contact ethics@foundationforgpe.org.
- The Designated Ethics Officer is responsible for handling misconduct incidents. The Foundation Designated Ethics Officer is committed to responding effectively, sensitively, and swiftly to all allegations. Upon receipt of a report by the Designated Ethics Officer, the whistleblower will receive communication to acknowledge receipt of the complaint within seven (7) working days from submitting the report.
- The Designated Ethics Officer will conduct a preliminary investigation of the allegation and any evidence made available, resulting in a determination of the most appropriate action. In addition, where

appropriate, while maintaining confidentiality and ensuring there is no conflict of interests, the matter may be communicated to the Chair.

- If a potential or existing conflict of interest is raised during this preliminary phase, in particular in relation to the Foundation Governance Officials, the Designated Ethics Officer may communicate the course of action in consultation with the Board or one of its members, while ensuring confidentiality or anonymity of the whistleblower.
- At the conclusion of the Foundation internal investigation, if appropriate, the Designated Ethics Officer may refer the matter for action the Foundation Board.
- The Foundation Board may decide of remedial actions on a case-by-case basis. The Foundation can seek consultation and support from prosecutor, authorities, external auditors, external counsel of the Foundation or any other relevant person, ensuring that the confidentiality is maintained and that such support will not result in a conflict of interest.
- The Designated Ethics Officer should inform the whistleblower about the result of the internal preliminary investigation within a three (3) months deadline after sending the acknowledgement of receipt of the complaint.
- Subject to considerations of the privacy of those against whom allegations have been made, and any other issues of confidentiality or legal nature, a whistleblower will be kept informed of the outcomes of the investigation into the allegations.



Definitions

- Misbehaviour or misconduct refers to wrongdoing actions e.g.
 - acting in an inappropriate or unethical way;
 - breaking internal rules or process set up in relevant policies;
 - not complying with applicable regulations and laws;
 - making fraudulent actions.
- Retaliation means any direct or indirect detrimental action recommended, threatened or taken because an individual engaged in good faith in a protected activity defined as follows:
 - reports the misbehaviour by one or more individual.
 - provides information on wrongdoing by one or more individuals; or
 - cooperates with a duly authorized investigation, audit or other oversight activities.
- A whistleblower is a person making a report in good faith to someone in authority about misconduct behaviour.
- Scope of reports, without limitations:
 - Sexual Abuse, Exploitation and Harassment
 - Abuse of authority
 - Fraud of corruption
 - Racism
 - Harassment or bullying
 - Conflict of interest
 - Retaliation

Modification table

Version number	Summary of changes	Date of approval
Whistleblowing v01		29 October 2025

