

HD Centre

Whistleblower Policy

Purpose

The HD Centre (HD) has established a Whistleblower Policy (hereafter, Policy), which allows staff members, consultants and business partners to report alleged misconduct or wrongdoing that is, or could become detrimental to HD activities, integrity and reputation, such as:

- Financial or operational mismanagement of HD assets;
- Unethical or unlawful conduct by any HD employee, consultant or business partner (eg. discrimination, bribes, receiving extravagant gifts);
- Serious breach of HD existing policies and regulations;
- Harassment (undue pressure on a person to gain an advantage).

The purpose of the Policy is to provide a mechanism for staff, consultants and business partners by which these concerns can be raised and addressed, free of fear, harassment and retaliation.

Mechanism

- Reporting a potential violation

A staff member, a consultant or a business partner can contact HD Internal Auditor (IA), Mr. Clive Harbutt, to report any alleged misconduct or wrongdoing. This information is transmitted (in English) to the IA either in person, by phone (a confidential hotline number has been set up: +41 22 908 0918) or by e-mail (clive.harbutt@sicg.com). This information needs to be as detailed as possible:

- What is the type of alleged wrongdoing reported?
- Where, when and how did it occur?
- Who are the persons involved?
- How was it discovered?
- Has the whistleblower any proof or supporting evidence about the wrongdoing reported?

Anyone reporting a potential violation must act in good faith and have reasonable grounds for believing that the information disclosed constitutes a potential violation.

- Responsibility of the IA

The IA is responsible for keeping the name of the whistleblower confidential; only the IA will have access to the name of the person providing the information. Furthermore the IA will be the only source of contact to the whistleblower

- Confidentiality

The Policy guarantees confidentiality to the person reporting alleged wrongdoing. For this reason, anonymous reports are neither considered, nor treated.

- Receiving and addressing reports

When receiving a report, the IA will first determine whether there are enough grounds to undertake an investigation. If needed, the IA will contact the whistleblower for further information. If the report is not within the scope of the policy, the IA will inform the whistleblower accordingly and advise him/her to use another channel.

If the report is considered as having sufficient substance and falling within the scope of the policy, the IA will “anonymize” the report: the name of the whistleblower will be removed from the report. The IA will then forward the report to a special Investigation Committee composed by HD board members, who will be tasked to investigate the matter and, depending on the nature of the case, may wish to include members of the Senior Management and/or external stakeholders in the investigation. These investigations will be carried out in complete independence and confidentiality.

- Reporting back to the whistleblower

The Investigation Committee will report its findings and possible action taken (or to be taken) to the IA, who will be tasked to inform the whistleblower.

- No retaliation

No whistleblower who reports a potential violation in good faith will suffer any form of retaliation.

- Regular reporting to the Chairman of the Board

The IA will periodically report to the Chairman of the Board on the level and nature of the reports made, as well as the result of investigations undertaken.

- Distribution of the Policy

A copy of this Policy will be included in the Personnel Handbook of each employee; the existence of this Policy will be regularly mentioned by management during staff meetings. Reference to this Policy will also be included in each consultant’s and business’s partners contracts. The Policy will also be made available on HD website.

- Caveats

The Policy does not cover Human Resources concerns or issues such as salaries and fringe benefits, promotions, etc. A serious breach of HR existing policies would be nevertheless covered under the Policy. The policy does not protect a whistleblower if s/he has wilfully made allegations that s/he knew were false or made with intent to misinform. In such a case, disciplinary measures could be envisaged.