



Whistleblowing Policy



1. Introduction

Inside Capital Partners (hereafter "Inside") is committed to ensuring that its operations are conducted in accordance with the law, ethics, and the highest standards of integrity. To uphold these values, Inside has established this whistleblowing policy to encourage employees, external stakeholders, and partners to report any concerns related to fraud, corruption, unethical practices, or illegal activities without fear of retaliation.

This policy applies to both internal and external stakeholders, providing a safe and confidential platform for raising genuine concerns. Complaints can be made confidentially or anonymously, and will be handled with the utmost confidentiality, ensuring the protection of the whistleblower's identity.

2. Purpose

The purpose of this policy is to:

- Promote transparency and accountability.
- Provide a clear framework for reporting concerns.
- Ensure that all whistleblowing complaints are investigated fairly, promptly, and thoroughly.
- Protect whistleblowers from retaliation or victimization, provided the report is made in good faith.

3. Scope of Reportable Concerns

Reportable concerns under this policy may include, but are not limited to:

- Fraud, corruption, or bribery.
- Breach of legal obligations.
- Unethical practices in accounting, financial reporting, and auditing.
- Endangerment to health, safety, or the environment.
- Misuse of office or breach of Inside's ethical principles and values.
- Criminal offenses or violations of human rights, such as gender-based violence, sexual exploitation, or harassment.
- Any attempts to conceal the above actions.

4. Reporting Channels

Whistleblowing concerns may be raised through the following channels:

Channels	Detail
Telephone	Contact the Anti-Corruption Manager at +230 460 1244
Email	Email address Anti-Corruption Manager: mpolge@insidecapital.net
Face to face	Concerns may also be raised in persona at any of Inside's offices in Zambia, Madagascar or Mauritius: Madagascar c/o SmartOne, Atrium Building Ankorondrano, Antananarivo 101 Mauritius Suite 8D1, Block 8, Cascavelle Business Park, Rivière Noire Road Unicity, Bambous Zambia 2nd Floor, Blue House, Plot 2374, Great East Road, Lusaka

Online Form	Use the contact form available on the Inside website, which redirects reports to designated officers: https://insidecapital.net/contact/
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5. Whistleblower Protection

Inside guarantees that any whistleblower who reports a concern in good faith will not face any form of retaliation, including harassment, discrimination, or dismissal. Anonymous reports will be accepted but are generally discouraged as they may limit the scope of investigation. Whistleblowers will be informed of the progress of the investigation, except where it may compromise the process.

6. Investigation Procedure

Upon receiving a complaint, the Anti-Corruption Manager will:

- Register the complaint and acknowledge receipt within 48 hours.
- Assess the nature and severity of the complaint.
- Conduct a thorough investigation, ensuring the confidentiality of both the whistleblower and the accused party.
- Communicate the outcome of the investigation to relevant decision-makers within Inside.
- Where necessary, take corrective action, which may include disciplinary measures or legal proceedings.

7. Rights of the Whistleblower and the Accused

- **Whistleblower:** Whistleblowers are entitled to confidentiality and protection from retaliation. They have the right to be informed about the progress of their complaint and access their personal data, subject to legal constraints.
- **Accused (Defendant):** The accused will be informed of the complaint against them, except in cases where this would jeopardize the investigation. The defendant's personal data will be protected, and they will have the right to defend themselves during the process.

8. Consequences of Unsubstantiated Complaints

Whistleblowers are expected to raise concerns in good faith. If a complaint is found to be malicious, unsubstantiated, or made with intent to harm, disciplinary action may be taken against the whistleblower, up to and including dismissal, subject to applicable laws.

9. Role of the Anti-Corruption Manager

The Anti-Corruption Manager is responsible for:

- Ensuring that all complaints are treated confidentially and with urgency.
- Managing the investigation process efficiently and impartially.
- Keeping all parties informed about the status and resolution of the complaint.
- Taking necessary measures to resolve grievances in a fair and timely manner.



10. No Adverse Consequences for Whistleblowers

Provided the report is made in good faith, whistleblowers will not face any adverse consequences, even if the complaint turns out to be unsubstantiated. Inside is committed to maintaining a culture of openness and integrity, where concerns can be raised without fear of reprisal.