



Private Infrastructure
Development Group
Pioneering infrastructure changing lives

Whistleblowing Procedures

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1 Introduction

The Private Infrastructure Development Group (PIDG, as defined below) is committed to creating a culture where anyone involved in or impacted by PIDG activities feels confident and safe to raise a concern about risk, malpractice, or suspected or actual wrongdoing by PIDG, or within projects sponsored or funded by PIDG.

This document sets out PIDG’s whistleblowing procedures (“**Procedures**”) for raising concerns, including the actions that PIDG will take to investigate and address the concerns raised.

These Procedures should be read in conjunction with PIDG’s Complaints and Whistleblowing Operating Policy (“**Policy**”). The Policy details, amongst other things, PIDG’s commitments to persons raising concerns, including our commitment to ensure that any individual raising a concern, or third parties connected with the person raising a concern, is not subjected to any harassment, victimisation or detrimental treatment (including informal pressures).

The Procedures are designed, established and operated in a secure manner such that the identity of the individual raising a concern, and any third party mentioned in the report, is kept confidential (unless required by law or regulation), and that data provided will be held securely in accordance with the PIDG Privacy Policy and applicable data protection legislation.

2 Who can raise a concern?

These Procedures may be used by any person who wishes to report wrongdoing by the Private Infrastructure Development Group Trust (the “PIDG Trust”) or any PIDG Company including The Private Infrastructure Development Group Ltd (“PIDG Ltd”), InfraCo Africa, InfraCo Asia, The Emerging Africa Infrastructure Fund Ltd, GuarantCo Ltd and ICF Debt Pool (together “**PIDG**”).

If any person wishes to raise a concern about a PIDG Service Provider or a PIDG Recipient (as defined below), they should raise their concern with the relevant entity in accordance with its whistleblowing procedures. However, any concern submitted to PIDG about a PIDG Service Provider or a PIDG Recipient will be investigated in accordance with these Procedures.

Those that may raise concerns under these Procedures include:

- PIDG employees, executive and non-executive directors, committee members, agency workers, volunteers, interns, consultants and contractors of a PIDG company, irrespective of the location of their engagement (“**PIDG People**”);
- third party service providers responsible for delivering the core activities of a PIDG company, including their workers and persons working under their supervision and direction (“**Service Providers**”);
- persons and entities which receive funding either directly or indirectly from PIDG, including their workers and persons working under their supervision and direction (“**PIDG Recipients**”);
- persons and entities whose relationship with PIDG is yet to begin, for example where information about wrongdoing has been acquired during a recruitment or procurement process, or pre-contractual negotiations;
- persons and entities whose relationship with PIDG has ended; and
- any other person affected by or that becomes aware of any actual or suspected misconduct, any actual or suspected breaches of the PIDG Code of Conduct, PIDG Operating Policies and Procedures including HSES policies, standards and procedures or any actual or suspected breaches of applicable laws or regulations in relation to our activities.

3 What issues can be raised?

Any concern about a risk, malpractice or wrongdoing in relation to activities which adversely affects the public interest, PIDG staff or PIDG itself can be raised. These concerns may show one or more of the following has been committed, is being committed or is likely to be committed:

- a criminal offence;
- failure to comply with applicable legislation and regulations;
- a miscarriage of justice;
- endangering the health or safety of any person;
- damage to the environment;
- breach of PIDG Code of Conduct or associated PIDG policies, procedures and standards; or
- the deliberate concealment of any of the above matters.

The risk, malpractice, wrongdoing may relate to a PIDG Company, or a project that PIDG supports (PIDG Project) or any transaction that PIDG is a party to. It may occur in any location. For the purpose of these Procedures wrongdoing which should be reported includes, but is not limited to:

- bribery and corruption;
- money laundering;
- fraud or theft;
- financial misrepresentation or mismanagement;
- mismanagement of conflicts of interest;
- contravention of environmental regulations;
- contravention of health and safety regulations and standards;
- modern slavery including forced labour, child labour and human trafficking;
- drugs and or alcohol abuse in the workplace;
- failure to comply with any legal or professional obligations or regulatory requirements;
- bullying;
- negligence;
- any form of gender-based violence and harassment (GBVH);
- any other form of harassment or discrimination including age, disability, gender, gender reassignment, race, religion or belief, marriage and civil partnership, pregnancy and maternity or sexual orientation;
- unauthorised disclosure of confidential information;
- unethical behaviour or practice;
- facilitation of tax evasion;
- breach of procurement rules and procedures; and
- conduct likely to damage PIDG's reputation.

As detailed in the Policy, if a person wishes to make a complaint or pursue a dispute relating to their own circumstances and not relating to a matter of public interest, the complainant should refer to either the PIDG Complaints Procedures or their own grievance policies outlined in a relevant staff handbook or contract, as appropriate.

4 How to Raise a Concern

4.1 The channels for raising a concern

- a) PIDG has established an independent whistleblowing hotline service for raising all concerns. The PIDG whistleblowing hotline is provided by Safecall. The service is independent of PIDG, enabling concerns to be raised in complete confidence. Safecall uses skilled and professional call handlers to take reports.

Safecall will ensure details of all concerns are forwarded confidentially for investigation, including anonymously where requested. Urgent matters will be prioritised and directed as appropriate.

Safecall can be contacted by:
 using the online service: safecall.co.uk/report
 telephone: 0800 915 1571 (UK)

A full list of telephone numbers for the countries in which PIDG operates is available on Safecall's website and at Annex 1.

- b) A concern may also be raised via the PIDG Ltd Chief Risk Officer (CRO). The CRO can be contacted using one of the following channels:

online enquiry form on the [Contact Us](#) page
 email to: compliance@pidg.org
 write to: The Private Infrastructure Development Group Ltd
 6 Bevis Marks
 London EC3A 7BA

In addition, a concern may be raised with a line manager, the next tier of management or relevant subject matter expert who will ensure the matter is appropriately investigated and addressed or escalated as necessary. If the matter is not addressed, then the channels above may be used.

Where the concern relates to a PIDG project company, the concern should first be raised in line with the project company's own whistleblowing procedures, unless the person raising the concern fears it will not be properly addressed or will be covered up, when the concern should be raised using these Procedures.

4.2 The information to provide

As much information as possible should be provided so that the concern can be fully investigated, including, as far as possible:

- Name and contact information of the person making the report (see paragraph 4.3)
- Date, place and time (as relevant) of the concern
- Name of the relevant PIDG Company to which the concern relates
- Name of the PIDG project (if any) to which the concern relates
- Details of the parties involved or suspected of being involved
- Details of stakeholders or affected persons to whom the concern relates and their locations
- Details of the concern, its basis and the known or suspected risk, malpractice or wrongdoing
- Any documentary or other evidence to substantiate the concern
- Whether the person raising a concern has a personal interest in the matter and details of the interest.

Safecall provides a webform for raising a concern via their website.

4.3 Anonymity

Individuals may raise concerns anonymously if they wish however, if concerns are raised anonymously, proper investigation may be more difficult or impossible if further information cannot be obtained.

Safecall provides three options of reporting:

- **Named:** The person raising a concern agrees their identity can be passed by Safecall to PIDG.
- **Semi-Anonymous:** The person raising a concern agrees to provide their identity to Safecall but not for this to be passed to PIDG. Safecall may contact the person raising a concern using the details provided.
- **Anonymous:** The person raising a concern does not provide their identity to Safecall or PIDG.

5 The Investigation Process

If PIDG is made aware of a concern through one of the channels above, the CRO or an alternate appointed by the CRO (or, in case of potential conflict, an alternate as determined by the Chair of the Audit Committee), will be responsible for investigating the concern and will undertake to:

- Acknowledge receipt of the concern as soon as possible but always within seven days of receipt.
- Request any additional information from and provide any feedback to the person raising a concern.
- Arrange a meeting with the person raising a concern as soon as possible to discuss their concern. A person raising a concern may bring a colleague or a representative to any meetings under this policy, however such person must respect the confidentiality of the disclosure and any subsequent investigation.
- Assess the severity of the matter raised to determine the scope of any investigation and ensure notification and/or escalation to PIDG Ltd's Audit Committee, PIDG Ltd's Board, and/or the PIDG Owners in respect of all material concerns.
- If necessary, appoint an investigator or team of investigators with relevant experience of investigations or specialist knowledge of the subject matter (including external investigators). The CRO (or appointed alternate) will ensure that members of the investigation team have no conflicts of interest.
- Conduct the investigation in an independent, fair, confidential and unbiased manner with respect to all parties involved. This will include collating and assessing information relating to the concern as quickly as possible and drawing evidence-based conclusions, including, where appropriate, collating information from the relevant PIDG individuals or team.
- Keep adequate and relevant records which may include, but will not be limited to, investigation notes, audio/video recordings of meetings, meeting minutes and emails. Where a recorded telephone line or another recorded voice messaging system is used when raising the concern, and subject to the consent of the person raising the concern, PIDG may document the oral report by making a recording of the conversation in a durable and retrievable form; or through a complete and accurate transcript of the conversation. In each case the person raising the concern will be offered the opportunity to check, rectify and agree the transcript or minutes.
- As far as possible, keep the person raising the concern informed of the decisions taken and the outcome of any enquiries and investigations carried out. However, PIDG will not be able to inform the person raising the concern of any matters which would infringe PIDG's duty of confidentiality to others or where it may breach, limit or waive duties or obligations under applicable laws or regulations.
- Provide a report of the outcome of the investigation to the person raising the concern (where their identity is known) within three months from the acknowledgement of receipt of the whistleblowing concern. If the investigation has not been completed, within three months of acknowledgement of receipt of the whistleblowing concern PIDG will provide an explanation for the delay and an indication of when the outcome will be reported.

Individuals who are asked to cooperate with an investigation, will be expected to provide all available information and answer all questions completely and honestly. Lying, knowingly withholding information, delaying, interfering or refusing to cooperate with an investigation may lead to disciplinary or other appropriate action.

6 Remedial Action

Following the investigation of a concern, the CRO, or appointed alternate, will work with other teams within PIDG (for example HSES), to define any remedial action that needs to be taken by PIDG so as to minimise the risk of future wrongdoing, and will ensure such agreed remedial action is undertaken promptly.

7 Escalation

In the event that a person raising a concern is not satisfied with the investigation and/or conclusion of the investigation conducted by another PIDG Company, Service Provider or PIDG Project, or believes that the concern will not be properly addressed or will be covered up, they should raise their concern through these Procedures.

In the event that a person raising a concern is not satisfied with the investigation and/or conclusion of the investigation conducted by PIDG Ltd, the concern may be raised with:

Chair, Audit Committee
The Private Infrastructure Development Group Ltd
6 Bevis Marks
London EC3A 7BA
E-mail: cyril.wong@pidg.org

8 External reporting and public disclosure

8.1 External reporting

There may be occasions when an individual considers it necessary to report a matter externally. This may be because a person feels that their concern has not been properly addressed or has been covered up within PIDG or that their concern will not be properly addressed or will be covered up. They may be required to report to the authorities by law. Concerns may therefore also be reported using external channels and procedures, either after having first been raised with PIDG, or by directly reporting to relevant institutions, bodies or agencies.

If a person decides to report their concerns to an external body rather than PIDG, they should try to make sure that they have chosen the correct person or body for their report. Government and citizens advice bureaus (or equivalent) should be able to assist with this. For example, the UK government provides a list of prescribed persons and bodies, together with a brief description about the matters that can be reported to each prescribed person or body at:

<https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2/whistleblowing-list-of-prescribed-people-and-bodies>.

8.2 Public disclosure

Occasionally it may be appropriate to make a public disclosure. This may be the case where:

- A concern was first reported to PIDG, to an external person or body, or directly to an external person or body, but no appropriate action was taken within a reasonable timeframe; or
- there are reasonable grounds to believe that the concern may constitute an imminent or manifest danger to the public interest, there is a risk of retaliation or there is a low prospect of the concern being effectively addressed, due to the particular circumstances of the case.

In such cases, any person wishing to make a public disclosure is strongly advised to seek independent advice from a legal adviser or specialist body.

9 Guidance and support

Guidance and support for persons raising a concern is available from:

- PIDG Complaints and Whistleblowing Champions in each PIDG Company (for guidance and support on these Procedures).
- PIDG's Employee Assistance Programme (EAP) which provides free confidential advice for the staff of PIDG Ltd and may include counselling.
- Protect (previously Public Concern at Work), an independent charity in the UK focused on whistleblowing which offers a confidential Helpline: (020) 3117 2520; E-mail: whistle@protect-advice.org.uk; Website: <https://protect-advice.org.uk/>.
- Whistleblowing International Network (WIN) which supports civil society organisations that defend and support whistleblowers around the world: <https://whistleblowingnetwork.org/>, E-mail: info@whistleblowingnetwork.org.

Annex 1

SAFECALL

The countries and phone numbers in bold text are freephone numbers.

Country	Phone number
Algeria	+44 191 516 7764
Bangladesh	+44 191 516 7756
Burkina Faso	+44 191 516 7764
Bhutan	+44 191 516 7764
Cambodia	1800 209 761
Cameroon	+44 191 516 7764
Chad	+44 191 516 7764
Cote d'Ivoire	+44 191 516 7764
Democratic Republic of the Congo	+44 191 516 7764
Ethiopia	+44 191 516 7764
Gabon	+44 191 516 7764
Ghana	+44 191 516 7764
India	000 80 04401256
Indonesia	001 803 440884
Indonesia (if PT Telekom)	007 803 440884
Jordan	+44 191 516 7756
Kenya	+44 191 516 7764
Liberia	+44 191 516 7764
Lao PDR	+44 191 516 7764
Madagascar	+44 191 516 7764
Malawi	+44 191 516 7764
Mali	+44 191 516 7764
Mozambique	+44 191 516 7764
Myanmar	+44 191 516 7761
Nepal	+44 191 516 7761
Nigeria	+44 191 516 7764
Pakistan	00800 900 44036
Philippines	1800 14410499
Republic of Guinea	+44 191 516 7764
Rwanda	+44 191 516 7764
Senegal	+44 191 516 7764
Sierra Leone	+44 191 516 7764
Singapore	800 448 1773
South Africa	0800 990243
South Sudan	+44 191 516 7764
Sri Lanka	2423109
Sri Lanka if outside of Colombo	011 2423109
Tanzania	+44 191 516 7764
Thailand	001 800 72332255
Togo	+44 191 516 7764
Uganda	+44 191 516 7764
UAE	8000 441 3376
United Kingdom	0800 915 1571
Vietnam (Mobifone)	121 020036
Vietnam (VNPT)	120 11157
Vietnam (Viettel)	122 80725
Zambia	+44 191 516 7764