

DOCUMENT ADMINISTRATION

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1.0 (Whistleblowing Policy)	Prepared by: Governance	May 2009
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2.0	Revised by: Director of internal Audit (as requested by Gavi Alliance Board Chair)	March 2011
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3.0	Updated by: Executive Office (change to Compliance Officer contact details)	21 January 2013
4.0	Revised by: Legal	February 2020
	Reviewed by: MD Audit & Investigations Director of Governance Director of Human Resources CEO Deputy CEO Staff Council	February – June 2020
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5.0 (Speak Up Policy)	Revised by: Audit and Investigations	March 2025
	Reviewed by: Legal HR ERCO SMG sub-group of the SLT Staff Council SLT AFC	March 2025 March 2025 April 2025 April 2025 May 2025 May 2025 June 2025
	Approved by: Gavi Alliance Board	25 July 2025 Effective from: 1 August 2025
	Next Review:	Every five years or earlier if needed

1. Purpose and scope

- 1.1. The purpose of this Policy is to encourage the reporting, without fear of retaliatory action, of suspected misconduct that may threaten the operations or governance of Gavi, the Vaccine Alliance (“Gavi”), and to enable Gavi to effectively address such misconduct, manage risks and uphold standards of good governance.
- 1.2. This Policy applies to:
 - a) all “members of the Gavi workforce”, defined as:
 - a. all employees, whether holding an indefinite or fixed-term contract of employment with the Gavi Secretariat, including interns; and
 - b. consultants and independent contractors, including temporary staffing agencies, and secondees who are contractually bound by this and other Gavi policies, rules and procedures in their contractual arrangements;
 - b) any member of the Gavi Alliance Board (including alternate Board members and Committee delegates) and Advisory Bodies (as defined in Article 19 of the Board and Board Committee Operating Procedures (together “governance officials”), members of the workforce of governments, partners or third parties, and any individuals involved with Gavi’s work.
- 1.3. This Policy does not apply to concerns associated with the performance of a Gavi employee, which are dealt with under the performance management procedures promulgated by HR, as are concerns associated with the performance management procedures themselves. Nor does it apply to concerns alleging infringement of right(s) enjoyed under the terms of employment with Gavi, which are dealt with under the Grievance and Appeals Procedures.

2. Key principles

- 2.1 Gavi recognises the important role reporting persons have in its accountability framework and more broadly in maintaining a culture of integrity. Gavi also recognises that reporting suspected misconduct is an important tool for instilling trust in its operations and enhance transparency and good governance. With this Policy, Gavi reaffirms its strong commitment and continuing support towards protecting people who have reported suspected misconduct in good faith, and encourages a culture of “speaking up.”
- 2.2 This Policy considers the interests of reporting persons, including their need for protection; the interests of subjects against whom allegations of misconduct may have been directed, including their need for confidentiality; and the interests of Gavi in maintaining a culture of integrity.
- 2.3 Reporting persons should feel empowered, without fear of retaliation, to speak up if they suspect that Gavi or anyone involved with Gavi’s work is committing misconduct.
- 2.4 Many partner organisations have their own programmes for reporting misconduct and those reporting from partner organisations may prefer to use those instead. Whichever route the reporting person prefers, it is important that concerns about misconduct related to Gavi’s activities are reported and that reports are handled appropriately. Gavi’s contractual agreements with partner organisations include appropriate information sharing clauses.

- 2.5 Gavi implementing governments are encouraged to have effective protection measures for reporting persons and confidential reporting channels to appropriately receive and address allegations of misconduct, including sexual exploitation, abuse and harassment (SEAH), which should cover Gavi-financed programmes.

3. Definitions

- 3.1 “Reporting person” means an individual who reports suspected misconduct in good faith.
- 3.2 “Misconduct” means misuse or any other wrongful activity in relation to a Gavi programme (including without limitation breaches of laws, rules or regulations in Gavi’s activities or of Gavi’s rules, policies or guidelines, sexual exploitation, abuse or harassment, or any action that is or could be harmful to the mission or reputation of Gavi).
- 3.3 “Retaliation” means any malicious direct or indirect detrimental action recommended, encouraged, threatened or taken because an individual has engaged in a protected activity. Retaliatory actions may include, without limitation, harassment, discrimination, inappropriate performance appraisals, salary freeze or adjustment, work reassignments, demotion, termination of employment or the withholding of an entitlement. Retaliation involves three elements:
- (i) an individual’s engagement in a protected activity;
 - (ii) followed by a direct or indirect adverse action threatened, encouraged, recommended or taken following such individual’s engagement in the protected activity, or if such action taken by others is not stopped; and
 - (iii) a connection between the individual’s engagement in the protected activity and the adverse action or threat thereof.
- 3.4 Reporting under this Policy is a “protected activity”, as is providing evidence as a witness in the context of an investigation.

4. Reporting suspected misconduct

- 4.1 A member of Gavi’s workforce who becomes aware of or receives information regarding suspected misconduct by another member of Gavi’s workforce is required to report this, as soon as possible after the event has occurred, in line with Gavi’s Reporting, Investigation and Disciplinary Procedures. A member of Gavi’s workforce who becomes aware of or receives information regarding any other suspected misconduct in relation to the activities of Gavi is required to report this, as soon as possible after the event has occurred, through one of the means provided under the Ethics Hotline tab on Gavi’s website.
- 4.2 A governance official who becomes aware of or receives information regarding suspected misconduct in relation to the activities of Gavi is expected to report this, as soon as possible after the event has occurred, through one of the means provided under the Ethics Hotline tab on Gavi’s website, where details of the information that the report should contain can also be found.

- 4.3 A member of the workforce of a government, partner or a third party, or an individual who becomes aware of or receives information regarding suspected misconduct in relation to the activities of Gavi is encouraged to report this, as soon as possible after the event has occurred, through one of the means provided under the “Ethics Hotline” tab on Gavi’s website, where details of the information that the report should contain can also be found.
- 4.4 The Managing Director, Audit and Investigations receives all reports under this policy. Gavi’s Audit and Investigations is a function within the organisation which has the authority to investigate misconduct and is independent of Gavi management. Any reports of suspected misconduct by the Managing Director, Audit and Investigations themselves, should be made through the specific means provided for this situation under the “Ethics Hotline” tab on Gavi’s website, which will ensure the report is received by an independent person.

5. Receiving and addressing allegations of misconduct

- 5.1 The Managing Director, Audit and Investigations (or their designee) will acknowledge receipt of reports in writing where possible within five working days of receipt, and will ensure that all reports are reviewed and properly followed up or referred to the appropriate party given the nature of the allegations.
- 5.2 Allegations of misconduct by a member of Gavi’s workforce will be treated in accordance with Gavi’s Reporting, Investigation and Disciplinary Procedures.
- 5.3 Allegations of misconduct by governance officials will be treated as agreed by the Chair of the Board, the Chair of the Committee and the Director of Governance, as appropriate.
- 5.4 Allegations of misconduct by members of the workforce of governments, partners or third parties will be treated in accordance with any contractual arrangement between Gavi and the party concerned. This may lead to an investigation by the Audit and Investigations Department, or a referral of the matter, potentially in consultation with the reporting person. The matter may, for example, be referred to one of Gavi’s partner organisations, if the Managing Director, Audit and Investigations determines that such organisation is best suited to address the allegation, in which case such organisation may apply its own reporting and investigation procedures. Alternatively, the matter may be referred to national authorities for prosecution in the event of a breach of national criminal laws. In the absence of any contractual arrangements with the party concerned, or where such contractual arrangements do not address the subject matter of this Policy, the Managing Director, Audit and Investigations determines the most suitable course of action, potentially in consultation with the Reporting person.
- 5.5 Reporting persons are provided with feedback on actions taken in follow-up to their report, in line with Gavi’s Reporting, Investigation and Disciplinary Procedures for those who are members of Gavi’s workforce or as otherwise appropriate.
- 5.6 Should an actual or potential conflict of interest exist, making it prudent for the Managing Director, Audit and Investigations to recuse themselves from treating the

allegation, they will identify an alternative mechanism in consultation with the Chair of the Audit and Finance Committee (AFC).

6. Protection

- 6.1 Gavi is committed to protecting reporting persons, through confidentiality and protection against retaliation.

Confidentiality

- 6.2 Gavi will make every effort to protect the identity of a reporting person and there can be no unauthorised disclosure of their identity. The Managing Director, Audit and Investigations may authorise disclosure in exceptional circumstances such as where required to protect against a credible and serious threat to the safety of the reporting person or another individual. If the information provided by the reporting person is required in evidence, they will be asked to testify as a witness and their identity as the person reporting the information will not normally be disclosed.
- 6.3 Gavi provides the opportunity to treat all reports of suspected misconduct as either confidential or anonymous. The choice between confidential or anonymous reporting is that of the reporting person alone.

Anonymity

- 6.4 Anonymity means that the identity of the reporting person is not known to the Managing Director, Audit and Investigations. Reporting persons should be aware that anonymous reporting does not enable Gavi to efficiently protect them, and anonymous reports are more difficult to investigate. When the information reported anonymously is not adequate to enable Gavi to determine whether an investigation is warranted, it may not be possible to take the report further. Anonymous reporters are encouraged to provide sufficient detail to allow for independent corroboration of the information provided, and, if possible, a way for Gavi to communicate with them while maintaining anonymity. The Ethics Hotline tab on Gavi's website provides for this.

Protection against Retaliation

- 6.5 Any member of Gavi's workforce who reports suspected misconduct in good faith will be protected from retaliation as described in the Charter for Ethics, Risk and Compliance and the Reporting, Investigation and Disciplinary Procedures.
- 6.6 In cases where a reporting person believes they are being retaliated against, they must report the suspected retaliation as per section 4 of this Policy. The report should be factual and contain as much specific and verifiable information as possible to determine whether there is a connection between the suspected retaliation and the previous reporting of suspected misconduct.
- 6.7 In the case of suspected retaliation against a member of Gavi's workforce, Gavi will assess whether protective measures need to be put in place for the employee

concerned, in accordance with the Charter for Ethics, Risk and Compliance and the Reporting, Investigation and Disciplinary Procedures.

- 6.8 In the case of suspected retaliation against a member of the workforce of a government, partner, or third party, Gavi encourages the government, partner or third party to adopt a comparable approach.
- 6.9 Retaliation by a member of Gavi's workforce, be it against another member of Gavi's workforce or an external party to the Secretariat, constitutes misconduct under the Reporting, Investigation and Disciplinary Procedures and may result in disciplinary measures.
- 6.10 If an investigation finds that an external party to the Secretariat has committed an act of retaliation, Gavi shall review any dealings with such party, and Gavi may take actions to hold the external party accountable. Actions may include, but are not limited to, terminating Gavi's dealings with such a party, refraining from future dealings with such a party, or exercising contractual remedies, if applicable, as well as referring the matter to judicial authorities.

Protection of personal data

- 6.11 Data received under this policy is managed in keeping with Gavi's Data Protection and Privacy Policy.

Protection against sexual exploitation, abuse and harassment

- 6.12 Gavi's approach to the protection of children and adults against sexual exploitation, abuse and harassment is set out in the Gavi Alliance Protection against Sexual Exploitation, Abuse and Harassment Policy.

7. Oversight and accountability

- 7.1 The AFC is responsible for overseeing the effectiveness of this Policy, in accordance with its responsibility to oversee, review and monitor the operation of the Audit and Investigations function.
- 7.2 The Managing Director, Audit and Investigations, is accountable for the execution, interpretation and integrity of this Policy.
- 7.3 The Managing Director, Audit and Investigations, reports periodically to the AFC on the number and nature of reports received and on the results of investigations undertaken. They also analyse reports and the results of investigations to identify any systemic issues, which are passed to the Secretariat and the AFC to assist in the development of more robust controls where appropriate.

8. Roles and responsibilities

- 8.1 The Managing Director, Audit and Investigations, is responsible for the receipt of reports of suspected misconduct and determination of how they should be progressed.

- 8.2 The Chief Ethics Risk and Compliance Officer is responsible for prima facie assessments as to whether members of Gavi's workforce have been subject to retaliation for reporting misconduct and for protecting members of Gavi's workforce against such retaliation.

9. Operating procedures for reporting suspected misconduct

- 9.1 The Gavi Secretariat's Reporting, Investigation and Disciplinary procedures set out the operating procedures within the Secretariat for treating reports of misconduct by members of Gavi's workforce, supported by Audit and Investigation's investigation manual.
- 9.2 Allegations of misconduct by governance officials are treated as agreed by the Chair of the Board, the Chair of the Committee and the Director of Governance, as appropriate.
- 9.3 Audit and Investigation's investigation manual sets out the operating procedures for treating reports of misconduct by members of the workforce of governments, partners or third parties.
- 9.4 The Charter for Ethics, Risk and Compliance at Gavi describes how any member of Gavi's workforce who reports suspected misconduct in good faith will be protected from retaliation.

10. Effective date and review of Policy

- 10.1 This Policy comes into effect as of 1 August 2025.
- 10.2 This Policy will be reviewed and updated every five years or earlier if needed.