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# Edge Worldwide Limited

## Whistleblower Policy for Reporting Financial Misconduct

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### 1. Purpose

The purpose of this policy is to provide a framework for the reporting of financial misconduct, fraud, or any unethical behaviour related to the handling of funds or resources at EDGE Worldwide. This policy ensures that individuals can report concerns about financial misconduct safely, confidentially, and without fear of retaliation. It is essential to protect the integrity of EDGE Worldwide and ensure compliance with applicable laws and regulations.

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### 2. Scope

This policy applies to all staff, volunteers, Responsible Persons (board members), members, contractors, and partners of EDGE Worldwide. It covers any concerns regarding financial misconduct or unethical behaviour, including but not limited to:

- Fraud or theft.
- Misuse of funds or resources.
- Financial mismanagement.
- Corruption or bribery.
- Falsification of financial records or reporting.
- Breach of financial policies and procedures.

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### 3. Reporting Procedure

#### 3.1 How to Report Misconduct

If you observe, suspect, or have knowledge of financial misconduct within EDGE Worldwide, you are encouraged to report the matter promptly. Reports can be made through the following channels:

- **Internal Reporting:**
  - To a designated Whistleblower Officer (e.g., Executive Director or Board Chair), who is responsible for ensuring that the report is handled appropriately.
  - To a trusted Responsible Person (board member) in the event that reporting to the Whistleblower Officer is not possible.
- **External Reporting (if necessary):**
  - If reporting internally is not an option or if you feel your concerns have not been adequately addressed, individuals may report to the relevant external authorities, such as:

- The Australian Charities and Not-for-Profits Commission (ACNC).
  - Cambodian government regulatory authorities (e.g., Ministry of Economy and Finance).
  - Relevant legal or law enforcement agencies.
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### **3.2 Confidentiality**

All whistleblower reports will be treated with the utmost confidentiality. Only those individuals who need to be involved in the investigation or resolution of the report will be informed, and their identities will be protected. The identity of the whistleblower will not be disclosed without their consent unless required by law.

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### **3.3 Protection from Retaliation**

EDGE Worldwide is committed to protecting whistleblowers from retaliation. No employee, volunteer, or partner will face any form of adverse action or retaliation as a result of reporting concerns in good faith. Retaliation includes, but is not limited to, dismissal, demotion, harassment, or any form of discrimination.

If any individual believes they have been subjected to retaliation as a result of their whistleblowing, they should report the matter immediately. EDGE Worldwide will investigate the retaliation complaint and take appropriate action to address it.

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## **4. Investigation Process**

### **4.1 Investigation of Reports**

Upon receiving a report of financial misconduct, EDGE Worldwide will undertake a thorough investigation to assess the validity of the claim. The investigation will be conducted in a fair and impartial manner, and all relevant parties will be interviewed.

The Whistleblower Officer or other designated party will oversee the investigation and ensure it is conducted in accordance with EDGE Worldwide's policies. The outcome of the investigation will be communicated to the whistleblower (where appropriate), and any corrective actions will be taken as needed.

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### **4.2 Outcome of Investigation**

If financial misconduct is found, corrective actions may include:

- Rectifying any misappropriated funds or resources.
  - Disciplinary actions against individuals involved, which could include termination or legal action.
  - Implementing changes to internal processes or policies to prevent future misconduct.
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## **5. Responsibilities**

### **5.1 Responsibility of the Whistleblower**

The individual reporting financial misconduct is expected to provide as much detail as possible, including any relevant documents, evidence, or supporting information, to assist with the investigation. While the whistleblower is not required to conduct an investigation, they should act in good faith and report any concerns honestly and responsibly.

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### **5.2 Responsibility of Management**

Management, including the Board of Directors and designated officers, is responsible for ensuring that all reports of financial misconduct are properly investigated and addressed. They must take immediate action to prevent any retaliation against the whistleblower and maintain confidentiality throughout the process.

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## **6. Training and Awareness**

EDGE Worldwide will ensure that all staff, volunteers, and Responsible Persons are aware of this policy and know how to report concerns. Training will be provided on financial integrity, reporting procedures, and protection against retaliation. Regular reminders of this policy will be included in relevant organizational meetings and communications.

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## **7. Policy Review**

This Whistleblower Policy will be reviewed annually to ensure it remains up-to-date with best practices, legal requirements, and the needs of the organization. Any amendments to this policy will be communicated to all staff, volunteers, and stakeholders.

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## **8. Acknowledgment and Agreement**

By engaging with EDGE Worldwide, all staff, volunteers, Responsible Persons, and partners acknowledge that they have read, understood, and agree to comply with this Whistleblower Policy.

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This policy should help establish clear reporting procedures for financial misconduct and promote a culture of transparency and accountability within EDGE Worldwide.

For any questions regarding this document, please contact EDGE WORLDWIDE LIMITED Worldwide Limited.

**Effective Date:** 18-03-2025

**Reviewed By:** Kate Bevan

**Next Review Date:** 18-03-2026