



ARCADIA GLOBAL SCHOOL

AGS Whistle Blowing Policy

2024-2026

Al Furjan

Dubai, United Arab Emirates



1. Purpose

1.1 The purpose of this policy is to strengthen our commitment to maintaining the highest standards of business conduct and ethics; adherence to best business practices; and the AGS Employee Code of Conduct.

1.2 This policy aims to encourage and enable employees to raise matters within AGS by providing a framework to promote responsible and secure whistleblowing.

1.3 All employees of AGS are required to observe and implement the guidelines as minimum expected service levels. Exemptions will only be granted for legal (contravene local and / or federal legislation), technological, cultural, or physical reasons. Sufficient supporting documentation is required in order to obtain an exemption.

2. Scope

2.1 The AGS Whistleblowing Policy applies to all board members, directors, officers, workers and temporary / contract staff at AGS and members of the Al Shirawi group.

2.2 The policy also extends to third parties doing business with AGS including vendors, customers and agents who may elect to use the Whistleblowing service.

2.3 The AGS Whistleblowing procedure is designed and operated in a manner to ensure that anyone who reports an issue and wishes to remain anonymous can choose to do so. All information provided will be treated with the utmost confidence by an independent team of experienced professionals.

2.4 This Policy covers Reportable Matters but does not cover staff grievances. A grievance is when an employee has a dispute about his/her own employment position. It is a matter of personal interest and does not impact on the wider public. Examples include bullying, harassment and discrimination. If an employee has a grievance, they should refer to the AGS Equality and Diversity Policy and/ or the AGS Child Protection and Safeguarding (uploaded on the website).

3. Definitions

3.1 "Reportable Matter(s)" can be defined as an illegal or unethical activity occurring, or reasonably likely to occur, within the company because of a violation of law, regulation or policy, including:

- Questionable accounting.
- Auditing matters.
- Violation of applicable Country laws and regulations.
- Any other company matters involved.
- Abuse of authority.
- Violation of AGS Employee Code of Conduct.
- Fraud, bribery, corruption.
- Health & safety or environmental issues, and
- Wastage/ misappropriation of company funds or assets.

3.2 “Safeguarding” is the action that is taken to promote the welfare of children and protect them from harm. Protecting children from abuse and maltreatment. Preventing harm to children’s health or development. Ensuring children grow up with the provision of safe and effective care.

4. Policy Statement

Reportable Matters

4.1 Any person may communicate a Reportable Matter to the Company pursuant to the procedures provided herein without fear of repercussion of any kind. The Company will not discharge, demote, suspend, threaten, harass or in any manner discriminate or tolerate discrimination against any employee based upon the employee’s good faith reporting of potential misconduct. If however the reported matter is found to be malicious in nature, a false or dishonest accusation, or an attempted act of defamation, the company has the right to pursue disciplinary action.

4.2 All employees are encouraged to report a Reportable Matter which they are aware of, to the company, when suspicion of fraud or illegal activity arises in the organisation or when the employee has knowledge or suspicion of activities that may be fraudulent and/or in breach of AGS Code of Conduct. This policy ensures that employees are empowered to pro- actively bring to light such instances without fear of reprisal, discrimination or adverse employment consequences.

4.3 Only genuine concerns that fit the above mentioned definition of a Reportable Matter should be reported.

4.4 Individuals may submit any report on a confidential and anonymous basis. If an employee chooses to provide his/her details but requests anonymity, AGS will not provide the identity of the employee under any circumstances.

Reporting

4 Employees are encouraged to follow the steps below to report on the Reportable Matters:

4.1 Arcadia Global School has a compliance system that allows employees the freedom and anonymity to speak up if they are uncomfortable with any operations, practice or conduct which would compromise or potentially compromise our organisational integrity.

Our success as an organization is built on a foundation of ethical decision-making and a commitment by every employee to uphold the highest standards of professional conduct on the job. The best way to sustain an ethical culture is for each of us to act with integrity every day, doing the right thing when it comes to our own behavior, being aware of what’s going on around us and being willing to speak up when we see or suspect activity that could harm our organization.

Your role within our team is to speak up if you know of or suspect any unethical behavior. Our role is to listen. Report any violations or get more information by contacting the hotline / links provided below:

Call Toll-free: 800 035704530
Online Web Link: alshirawi.ethicspoint.com
Mobile Link: alshirawi-mobile.ethicspoint.com

4.2 If members of staff do not feel comfortable using the anonymous helpline, the following members of The Whistle blowing Committee can also be contacted.

4.3 Step 1: Direct the Reportable Matter to the DSL or DDSL

The Designated Safeguarding Lead (DSL) at Arcadia Global School is:

Colbie Robinson – FS Lead



Email: colbie.robinson@arcadiaglobal.sch.ae

Phone number: 0585232987

4.4 The Deputy Designated Safeguarding Lead (DDSL) at Arcadia Global School are:

Amparo Tenorio – Primary Inclusion Lead



Email: amparo.tenorio@arcadiaglobal.sch.ae

Phone number: 0522923719

Charlotte Dias – Secondary Inclusion Lead



Email: charlotte.dias@arcadiaglobal.sch.ae

Phone number: 0508615127

4.5 Step 2: If the employee is not comfortable speaking to the DSL or DDSL or suspect they may be involved in the Reportable Matter or they are not satisfied with their response, the employee is encouraged to report it to:

Andrew Wilson – Founding Principal at AGS



Email: andrew.wilson@arcadiaglobal.sch.ae

Phone number: 0569964362

4.6 Step 3: If the employee is not comfortable speaking to the DSL/ DDSL or the Founding principal, Andrew Wilson or suspect they may be involved in the Reportable Matter or they are not satisfied with their response, the employee is encouraged to report it to:

Navin Valrani - CEO



Email: navin.valrani@executive.sch.ae

Phone number: 0566440410

4.7 The Whistle blowing Committee

The Whistle blowing Committee includes the Designated Safeguarding Lead, Ms. Colbie Robinson, FS Lead, Deputy Designated Safeguarding Lead, Ms. Amparo Tenorio, Primary Inclusion Lead and Ms. Charlotte Dias, Secondary Inclusion Lead. The Whistle blowing Committee will evaluate the report to assess the nature, scope, and impact of the potential Reportable Matter.

4.8 The Committee will decide how to respond in a responsible and appropriate manner under this policy

4.9 Whilst this policy is intended to protect genuine informants from any unfair treatment as a result of their disclosure, misuse of this protection by making false complaints with malicious intentions is strictly prohibited.

4.10 False accusations will not be tolerated. If an employee or third party makes a report which he/she reasonably knows to be false, he or she will be subject to disciplinary action. False accusations may also have legal repercussions leading to civil or criminal prosecution.

Policy Implemented: November 2024

Policy Review Date: August 2026

Policy Responsibility: Founding Principal

Version: 1