

# Whistleblower Policy

21

ACADEMY





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*to offer excellent face to face and online academic courses with the aim of providing students with a learning experience comprising of quality of teaching, learning facilities and a positive education experience.*

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# Policy Statement

21 Academy is committed to promoting an environment of transparency, accountability, and ethical conduct. This Whistleblower Policy provides a mechanism for employees and stakeholders to report concerns or suspicions of illegal, unethical, or improper activities related to the operations of 21 Academy, while ensuring confidentiality and protection against retaliation.



# 1. Scope

1.1 This policy applies to all employees, contractors, volunteers, students, and stakeholders of 21 Academy in Malta.

1.2 It covers the reporting of any activity that is believed to be in violation of laws, regulations, policies, or ethical standards applicable to 21 Academy.

# 2. Reporting Channels

2.1 Whistleblower reports can be made through the following channels:

- a) Direct reporting to a designated Whistleblower Officer (an individual assigned by 21 Academy.
- b) Email reporting to a dedicated whistleblowing email address specified by 21 Academy.
- c) Anonymous reporting through an independent third-party reporting service, ensuring confidentiality and anonymity.

## 3. Protection and Confidentiality

3.1 Whistleblower reports will be treated with the utmost seriousness, and the identity of the whistleblower will be kept confidential to the fullest extent permitted by law.

3.2 Anonymous reports will be accepted and thoroughly investigated. However, individuals are encouraged to provide their contact information to facilitate further communication and investigation if needed.

3.3 21 Academy prohibits retaliation against whistleblowers who make good faith reports. Any individual found to engage in retaliatory actions will be subject to disciplinary measures, up to and including termination of employment or contract.

## 4. Investigation and Follow-up

4.1 The designated Whistleblower Officer or a designated investigation team will promptly evaluate and investigate all whistleblower reports.

4.2 Investigations will be conducted in a fair, impartial, and confidential manner, ensuring appropriate due process.

4.3 The outcome of the investigation will be communicated to the whistleblower within a reasonable timeframe, while maintaining confidentiality to the extent possible.

## 5. False Reports

5.1 Making a knowingly false or malicious report with the intention to harm or harass others is strictly prohibited and may result in disciplinary action against the individual making the false report.

## 6. Non-Retaliation

6.1 21 Academy is committed to protecting whistleblowers against any form of retaliation. Any individual who believes they have experienced retaliation as a result of making a whistleblower report should immediately report the matter to the designated Whistleblower Officer, who will promptly address the issue.

## 7. Awareness

7.1 21 Academy will conduct regular awareness campaigns to educate employees, contractors, volunteers, students, and stakeholders about the Whistleblower Policy, including its purpose, reporting channels, and protections.

This Whistleblower Policy is designed to provide a mechanism for reporting and addressing concerns regarding illegal, unethical, or improper activities at 21 Academy. It is aligned with applicable laws and regulations in Malta and demonstrates 21 Academy's commitment to maintaining the highest standards of integrity and ethical conduct.



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