



CONTINENTAL REINSURANCE PLC

WHISTLEBLOWING POLICY

Approved by the Board of Directors on 29th July 2022

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1.0. Introduction

Continental Reinsurance PLC (**"the Company"**)(**"CRe"**) is committed to the highest standards of openness, probity, accountability, honesty, integrity, fairness, and high ethical behaviour by fostering and maintaining an environment where employees and other stakeholders can act appropriately, without fear of reprisal. To maintain these standards, the company encourages employees and relevant stakeholders who have material concerns about suspected misconduct or any breach or suspected breach of law or regulation that may adversely impact the company, to come forward and report same through laid down channels and procedure without fear of retribution or unfair treatment.

The company is committed to investigating promptly any reported misconduct and to protect those who come forward to report such activities, whilst assuming that every defendant is not liable until proven otherwise. The Company further assures that all reports shall be treated in strict confidence.

The best systems of controls may not provide absolute safeguards against irregularities, thus the need for this Policy which is intended to facilitate the investigation and taking of appropriate action against any reported misconduct or concern.

The Board of Directors and Management of the Company are committed to this Policy, and will not tolerate any harassment, victimization, or discrimination of the Whistleblower, provided such disclosure is made in good faith with reasonable belief that what is being reported is fact.

2.0. Definition

The following words used in this Policy shall have the following definitions for the purpose of this Policy.

2.1.	Defendant	Person(s) indicted by a report of a Whistleblower.
2.2.	Ethics Point Incident Management System:	An independent and secure Whistleblower Portal online services delivered by NAVEX Global Inc and hosted on the website of Navex Global Inc through which Navex Global Inc receives and processes Whistleblowers report and sends them to the Company for investigation.
2.3.	Executive Management	Managing Director/CEO, Executive Directors, General Manager,
2.4.	Full Disclosure:	a disclosure of all the actual identity details and contact information of the Whistleblower.
2.5.	Junior Staff	All staff below the grade of Executive Assistant
2.6.	Good Faith:	This is when a report or complaint is made without malice or consideration of personal benefit and the person making the complaint/report has a reasonable basis to believe that the report is true; provided, however, that a report does not have to be

		proven to be true to be made in good faith. Good faith is lacking when the disclosure is known to be malicious or false.
2.7.	Malice:	wrong intent or behaviour that is intended to harm someone or his or her reputation or cause embarrassment or upset.
2.8.	Management Staff	All officers from Manager up to Deputy General Manager
2.9.	Investigation	A process designed to gather and analyze information in order to determine whether misconduct has occurred and if so, the party or parties responsible.
2.10.	Investigator or Panel of Investigators	Person(s) appointed by the Case Management Team to lead the investigation of the report made by a Whistleblower.
2.11.	Partial Disclosure	A disclosure of some the details of the identity and contacts of the Whistleblower which may not be enough to completely identify him or her but enough to be able to determine the employee's status as an employee or not and to contact the Whistleblower, if need be.
2.12.	Personal work-related grievance	This is a report of behaviour that has implications for the discloser personally and does not have significant implications for the Company. Examples include: <ul style="list-style-type: none"> a. an interpersonal conflict between the employee making the report and another employee, or b. a decision relating to your employment or engagement, such as a transfer, promotion, or disciplinary action.
2.13.	Reasonable Grounds to Suspect:	This is an objective assessment of the reason to for the suspicion. It is a belief based on some information.
2.14.	Reportable Misconducts:	These are conducts listed, but not limited list, in sub-paragraph 4.4 of this Policy
2.15.	Senior Staff	All staff from Executive Assistant to Assistant Manager
2.16.	System Administrators:	Means CRe liaison with Navex Global and the administrators of Navex system. The System Administrators shall be the Chief Compliance Officer and Head of Internal Audit of the Company.
2.17.	System Advocate	Means CRe liaison that will receive a case only when all other system users are restricted, usually because the case is against Executive Management Cadre or because other system users are implicated in the case. The System Advocates shall be the law firm of Bayo Osipitan & Co

2.18.	Whistleblower	Any person(s) including employee, director, service provider, creditor, and other stakeholders of an institution who reports any form of misconduct, unethical behavior, or dishonesty on the part of the Company or its staff or directors to the appropriate authority.
2.19.	Whistleblowing	The act of reporting an observed/perceived misconduct, or unethical behaviour of employees, management, directors, or other stakeholders of an organization to the appropriate authority. It is an early warning system that enables an organization to find out when something is going wrong in time to take necessary corrective action.

3.0. Objectives of the Policy

The purpose of this Policy is to encourage employees and other relevant stakeholders to report unethical conduct/violation of rules and regulations by employees, management, directors, and other stakeholders to appropriate authorities in a confidential manner without any fear of harassment, intimidation, victimization, or reprisal from anyone for raising concern(s) under this Policy. This Policy also aims to encourage a culture of openness and accountability, where employees are assured that all disclosures or reports will be handled in a serious and confidential manner, and clear procedures for reporting and handling such concerns are provided, in a manner that deters conduct that will negatively impact the business of the Company.

4.0. Scope

- 4.1. This Policy applies to the Company and its directors, employees, subsidiaries, stakeholders, and members of the public who have concerns that may affect the Company.
- 4.2. This Policy is designed to enable employees and other relevant stakeholders of the Company to report any perceived act of impropriety which should not be based on mere speculation, rumours, and gossip but on knowledge of facts.
- 4.3. Personal work-related grievances do not qualify for protection under this Policy. Personal work-related grievances may be raised with the line managers or the Human Resources Department of the Company, as the case may be.
- 4.4. Reportable misconducts covered under this Policy include but are not limited to: -Accounting, auditing, and financial reporting (e.g., financial misconduct, breach of internal controls, and expense reporting)
 - 4.4.1. All forms of financial malpractices or impropriety such as fraud, corruption, bribery, theft, concealment, and undisclosed conflict of interest.
 - 4.4.2. Failure to comply with legal obligations, statutes, and regulatory directives.

- 4.4.3. Improper conduct or unethical behaviour that undermines universal and core ethical values such as integrity, respect, honesty, accountability, and fairness.
 - 4.4.4. Environment, health, and safety (e.g., danger to health and safety of members of staff or damage to the environment)
 - 4.4.5. Misuse and misappropriation of the Company's assets (e.g., abuse of office, use of the Company's assets for personal purposes)
 - 4.4.6. Sexual or physical abuse of staff, customers, prospective staff, service providers and other relevant stakeholders.
 - 4.4.7. HR, diversity, and workplace respect (e.g., discrimination, harassment, victimization, and assault)
 - 4.4.8. Engaging in or threatening to engage in detrimental/ retaliatory conduct against a person who has made a disclosure or is believed or suspected to have made or is planning to make a disclosure.
 - 4.4.9. Concealment or attempt to conceal any of the above listed acts.
- 4.5. The above listed misconducts or concerns are not exhaustive. However, good judgment and discretion are required to determine misconduct that should be reported under this Policy. The general guide in identifying reportable misconduct is to report concerns which are repugnant to the interest of the company and the public.

5.0. **Roles and Responsibilities**

- 5.1. The following are the key parties in the whistleblowing process, and their roles and responsibilities:
- 5.1.1. **Whistleblower** – A Whistleblower is expected to act in good faith and refrain from making false accusations when reporting concerns, and to forward all available evidence to aid investigation of the issues reported. Before making your report, you should satisfy yourself that there is a Reasonable Grounds to Suspect the existence of a Reportable Conduct.
 - 5.1.2. **Navex Global Inc:** An independent corporation that runs the Ethics Point Incident Management online system and is responsible for receipt and processing of reports made by Whistleblowers on the portal.
 - 5.1.3. **Defendant** – A defendant has a duty to cooperate with investigators during the period of investigation including provision of relevant information, documents or other materials as may be required by the investigator or that may aid in concluding and resolving the report.
 - 5.1.4. **Investigator or Panel of Investigators** – the investigator or Panel of Investigators shall handle all reports with high levels of professionalism, confidentiality, and dispatch. The Investigator shall be independent, objective, and unbiased in carrying out investigations. Every report shall be benchmarked against existing policies and procedures of the Company, relevant codes, rules & regulations, and legislations.

5.1.5. **The Compliance Department** – shall be responsible for reviewing and updating this Policy and procedure.

5.1.6. **Human Resources** - The Head of Human Resources of the Company shall communicate this Policy to all existing and future employees and shall implement the report of investigations that indict Employees as contained in the Company’s Handbook.

5.1.7. **System Administrators:** are the administrators of the Navex System and have the following administrative duties:

- Adds new users to the system
- Internal point person for ongoing system use, questions, and maintenance
- Responsible for adding/importing users
- Responsible for Login Credentials

5.1.8. **System Advocates:** are independent professionals that are appointed to receive a case that indicts Executive Management and the Board of Directors and only when all other system users are restricted, usually due to being implicated in the case

6.0. Whistleblowing Procedures

This involves steps that should be taken by the Whistleblower in reporting misconduct, and steps required for the investigation of the reported misconduct:

6.1. Making a Report

6.1.1. A Whistleblower may make a report through any of the following channels:

- i. Through the Ethics Point Incident Management System, the Company’s independent and secure whistleblower online services delivered by NAVEX Global Inc (**NAVEX**). Report to Navex may be made through:
 - a. A secure web link hosted on the Company’s website which may also be accessed by clicking [here](#).

or

- b. By contacting Navex via the following telephone numbers:

Country	Number
Nigeria	0-708-060-1816 Followed By 855-229-9304
Kenya	0-207-602-020 Followed By 855-229-9304
Botswana	704-526-1125
Cameroon	704-526-1125
Cote D'ivoire	855-229-9304
<i>Tunisia</i>	704-526-1125

- ii. While reporting on our Navex Portal is the Company's preferred channel for making a report, a Whistleblower may also make a formal report, orally or in writing, to any of the listed officers of the Company - **the Chief Compliance Officer, Head of Internal Audit, the Group Managing Director, Chairman of the Board of Directors, Chairman of the Board Audit and Compliance Committee.**
- iii. Or via the Company's dedicated email address: speakup@continental-re.com accessible by the Chief Compliance Officer and the Head of Internal Audit.

6.1.2. The Chief Compliance Officer and the Head of Internal Audit shall be the Company's liaison and **System Administrators** of NAVEX Ethics Point Incident System.

6.1.3. Where a Whistleblower makes a report on the Navex System, Navex shall process and forward the reports that indict Management Staff, Senior Staff and Junior Staff to the Chief Compliance Officer and Head of Internal Audit & Control.

6.1.4. Where the report or disclosure indicts the Head of Internal Audit, the Chief Compliance Officer, or any other member of Executive Management, Navex will forward the report to the System Advocates.

6.1.5. The System Administrators shall conduct a preliminary assessment of the reports received in respect of Management Staff, Senior Staff and Junior Staff and assign them to the appropriate Case Management Team for investigation.

6.1.6. The System Advocates shall conduct a preliminary assessment of the reports that indict the Head of Internal Audit or the Chief Compliance Officer and send an assessment report to the GMD. The GMD shall forward the report to the appropriate Case Management Team for investigation.

6.1.7. The System Advocates shall conduct a preliminary assessment of the reports received in respect of Executive Management and forward an assessment report to the Board of Directors. The Board of Directors shall forward the report to the appropriate panel for investigation.

6.1.8. The cases received by the System Administrators shall be distributed to the Case Management Team in the categories stated below. These categories may be altered administratively, from time to time, as the report demands and, in a bid, to attain effective investigation of the report.

Issues	Case Management Team
Employee Mistreatment	Human Resources Legal & Compliance
Account Irregularities	Finance Human Resources Risk Management Internal Audit Legal & Compliance
Workplace Violence	Operations Human Resources Legal & Compliance
Employee Theft	Internal Audit Finance Human Resources Legal & Compliance
Undue Influence and Sexual Harassment	Risk Management Internal Audit Human Resources Legal & Compliance

- 6.1.9. Where a report is received by an office other than the office of the Chief Compliance Officer or the Head of Internal Audit, the recipient (e.g., line manager), the concerned line manager shall immediately forward the report to the System Administrators or the System Advocates as the case may be).
- 6.1.10. Where the report concerns the Board of the Company or any of its subsidiaries, the Whistleblower may, either directly or through the Navex Global Ethics Point system, report to the System Advocates or to the following:

Role	Contact
Board Member	Chair of the Board; Audit & Compliance Committee
Chair of the Board	Chair of the Audit & Compliance Committee

- 6.1.11. Whistleblowers are encouraged to provide as much detailed information as possible in their report so that their report can be investigated. Such useful information includes but is not limited to:
- a) date, time, and location.
 - b) names of the person(s) involved and their roles
 - c) Your relationship with the person(s) involved

- d) the general nature of your concern.
- e) how you became aware of the issue.
- f) possible witnesses; and
- g) other information or documents that you have as evidence to support your report.

6.1.12. A Whistleblower may, in the making of a report, choose to fully disclose his or her identity, partially disclose his or her identity, or remain anonymous. If a Whistleblower decides to disclose his or her identity (fully or partially), the Company will take all necessary steps to ensure that he or she does not suffer any retaliation.

6.1.13. The Whistleblower's identity may, only, be disclosed in the following circumstances:

- a. The Whistleblower consents to such disclosure
- b. The Company is required to disclose the identity by law

6.2. Investigating a Report

6.2.1. The System Administrators shall conduct a primary assessment of the reports received to determine among other things:

- a) Category of the concern
- b) Completeness and credibility of information
- c) The likelihood and potential impact of risk to the Company or its stakeholders
- d) Precautionary measures to be taken to minimize the risk of further wrongdoing or prevent any further loss of assets and damage to the Company's reputation.

6.2.2. In the event that the report is outside the Reportable Misconduct or that which is envisaged under this Policy, the Chief Compliance Officer shall refer the matter to appropriate quarters for further action.

6.2.3. Where the System Administrators find that the report falls within the parameters of Reportable Misconducts, they shall assign the report to the appropriate Case Management Team.

6.2.4. The Case Management Team shall appoint an Investigator or form a Panel of Investigators (internal or external) for the investigation of the report, taking into consideration:

- i. The severity of the report.
- ii. The urgency required in dispatching the investigation
- iii. the capacity and personal attributes of the investigator who must be knowledgeable on the subject matter of the investigation, impartial, analytical, emotionally intelligent, courageous, and fair.
- iv. The independence of the investigation process

- 6.2.5. At this point, the Investigator or Panel of Investigators shall inform the Defendant, in writing and in clear terms of the report involving him/her and provide him/her with evidence if any. The Defendant shall, in turn, respond in writing and provide counterevidence if any. The Defendant may be invited, or apply, to make an oral presentation or clarification on the cause of the investigation.
- 6.2.6. In the course of the investigation of the Report, the Investigator or Panel of Investigators may take the following steps:
- a) Gather more information if need be.
 - b) Engage with other functions (e.g., HR, legal, internal audit, compliance, health and safety, finance), if needed to investigate the concern without compromising the confidentiality of the investigation.
 - c) Appoint an independent consultant to conduct a forensic investigation where the need arises.
 - d) Seek for professional advice in any area necessary to the effective conclusion of the investigation.
- 6.2.7. While the circumstances of each report may require a different investigation approach, all investigations will:
- a. follow due process.
 - b. be conducted as quickly and efficiently as the circumstances permit.
 - c. determine whether there is enough evidence to substantiate the matters reported,
 - d. be independent of the person(s) concerned with the allegations; and
 - e. There will be a **presumption of innocence** of the Defendant until the outcome of the investigation is determined.
- 6.2.8. Where the result of the investigation reveals that the Defendant is liable, the Company's disciplinary procedure will be deployed. The Executive Management or members of the Board (as the case may be) may at their discretion take appropriate actions against the Defendant. These actions may include, but are not limited to, warning, suspension, dismissal, or reporting the concern to the police or any relevant authorities.
- 6.2.9. The Executive Management shall be responsible for executing disciplinary actions and procedures against Management Staff, Senior Management and Junior Management and the Board of Directors shall be responsible for executing disciplinary actions and procedures against Executive Management.
- 6.2.10. If the preliminary assessment finds the report made to be frivolous, or unwarranted, the investigators shall dismiss such complaint after having presented a report of their findings along with the recommendation for dismissal to the System Administrators,

in case of Management Staff, Senior Management and Junior Management and to the System Advocates in the case of Executive Management and Members of the Board of Directors. In such cases, the Investigators or Panel of Investigators may recommend that disciplinary actions be taken against the Whistleblower in accordance with the provisions of the Staff Handbook.

6.2.11. Investigations will be concluded promptly and appropriately within 21 working days of completion of the Primary Assessment. The Investigations may be concluded earlier or later than this timeframe, depending on the complexity, urgency, availability of evidence and cooperation of the Whistleblower. Where the investigation is not concluded within this period, the Company will inform the Whistleblower that it is unable to do so and thereafter advise the Whistleblower once the Investigation is concluded.

6.2.12. Where the allegations against a Defendant are found to be unsubstantiated at the conclusion of the investigation, same shall be communicated to the Defendant in writing.

6.2.13. A case is said to be concluded when the allegation has been proven or disproven or where the findings are inconclusive, and no further action is required. Upon conclusion of investigation, the Investigator shall submit a written report and recommendations to the System Administrators. The conclusion of a case signals the end of the inquiry into the whistleblowing report.

6.3. Investigating Members of Executive Management

6.3.1. Where a Whistleblower makes a report against the Executive Management, the System Advocates shall conduct a primary assessment of the reports received in accordance with this Policy.

6.3.2. If the preliminary assessment shows that the concern falls within the whistleblowing reportable misconducts, and considering sub-paragraph 6.2.1 above then, The System Advocates shall refer the case to the Chair of the Board, Audit & Compliance Committee for investigation. The Chairman of the Board or the Audit & Compliance Committee shall appoint an appropriate person(s) to investigate the report.

6.3.3. Upon conclusion of the investigation, the Investigator shall submit a written report and recommendations to the Chairman of the Board of Directors and the Audit & Compliance Committee. A case is said to be concluded when the allegation has been proven or disproven or where the findings are inconclusive, and no further action is required.

- 6.3.4. Where the allegations against a defendant are found to be unsubstantiated at the conclusion of the investigation, same shall be communicated to the Defendant in writing.
- 6.3.5. Where the Defendant is found liable, the Board of Directors shall deliberate on the report of investigations of the Audit Committee and their recommendations and afterwards execute the appropriate disciplinary action.
- 6.3.6. Investigations will be concluded promptly and appropriately within two months of completion of the Primary Assessment. The Investigations may be concluded earlier or later than this timeframe, depending on the complexity, urgency, availability of evidence and cooperation of the Whistleblower. Where the investigation is not concluded within this period, the Company will inform the Whistleblower that it is unable to do so and thereafter advise the Whistleblower once the Investigation is concluded.

6.4. Investigating Members of the Board

- 6.4.1. Where a Whistleblower makes a report against any member of the Board of Directors the System Advocates shall conduct a primary assessment of the reports received in accordance with this Policy.
- 6.4.2. If the preliminary assessment shows that the concern falls within the whistleblowing reportable misconducts, and considering sub-paragraph 6.2.1 above then, The System Advocates shall forward the report to the Board of Directors. The Board of Directors shall appoint the System Advocates or an appropriate and qualified person(s) to investigate the report.
- 6.4.3. The Board of Directors shall consider the capacity and personal attributes of the members of the panel who must be knowledgeable on the subject matter of the investigation, impartial, analytical, emotionally intelligent, courageous, and fair.
- 6.4.4. Upon conclusion of the investigation, the Panel of External Investigators shall submit a written report and recommendations to the Chairman of the Board of Directors of the Company, the conclusion of a case signals the end of the inquiry into the whistleblowing report.
- 6.4.5. Where the allegations against a defendant are found to be unsubstantiated at the conclusion of the investigation, same shall be communicated to the Defendant in writing.

- 6.4.6. Where the Defendant is found liable, the Board of Directors shall deliberate on the report of investigations of the External investigators and their recommendations and afterwards execute the appropriate disciplinary action.
- 6.4.7. The Chairman of the Board of Directors or any Director(s) that is affected by a report of a Whistleblower shall not be involved in any process or deliberation with respect to that report.
- 6.4.8. Investigations will be concluded promptly and appropriately within three months of completion of Primary Assessment. The Investigations may be concluded earlier or later than this timeframe, depending on the complexity, urgency, availability of evidence and cooperation of the Whistleblower. Where the investigation is not concluded within this period, the Company will inform the Whistleblower that it is unable to do so and thereafter advise the Whistleblower once the Investigation is concluded.

6.5. Non-Satisfaction with the result of the investigation

- 6.1.1. In the event that the Whistleblower is not satisfied with the extent of the investigation and or the action taken based on the outcome of the investigation, the Whistleblower is at liberty to make a report directly to the GMD and Chairman, Audit & Compliance Committee.
- 6.1.2. Any internal Whistleblower that feels victimized can report his/her grievance(s) to the GMD and escalate to the Chairman Audit & Compliance Committee if need be.
- 6.1.3. Any defendant that feels dissatisfied with the outcome of an investigation or feels victimized following the conclusion of any investigation may make a report to the Chairman Audit & Compliance Committee.

7.0. Communicating with Whistleblower

- 7.1. Where a Whistleblower fully or partially discloses his or her identity and provides a contact information, The Company may reach out and request for further information in the course of the investigation and will notify the Whistleblower once the investigation has been completed. However, the Company may be unable to disclose particular details or the outcome of the investigation.
- 7.2. Where a report is made by the Whistleblower on the Company's the Navex Global Ethics Point system, a report key and password is created for each report and the Whistleblower is encouraged to log back in from time to time to follow up on the progress of the investigation and to respond to any inquires that the Company may have on the report, especially if the report is made anonymously.

8.0. Reporting to the Board of Directors

The Chief Compliance Officer shall provide a quarterly report to the Audit & Compliance Committee on the summary of reported cases, cases investigated, the process of investigation, and the result of the investigations conducted in a quarter.

9.0. Protection for Whistleblowers

- 9.1. It is the Policy of the Company to protect Whistleblowers who disclose concerns, provided the disclosure is made:
 - 9.1.1. with the reasonable belief that it is intended to expose malpractice or impropriety.
 - 9.1.2. to an appropriate person or authority; and
 - 9.1.3. In good faith without malice or mischief.
- 9.2. While all disclosures resulting from whistleblowing shall be treated with high a level of confidentiality, and may be made anonymously, employees and other relevant stakeholders are encouraged to disclose their names in order to make the report more credible. The company shall take the following into consideration in considering disclosure:
 - 9.2.1. seriousness of the issues being reported.
 - 9.2.2. the significance and credibility of the concern; and
 - 9.2.3. the possibility of confirming the allegation.
- 9.3. The company shall not subject a Whistleblower to any detriment. Where a Whistleblower feels unfairly treated owing to his/her actions, the Whistleblower shall be at liberty to report as appropriate to any regulatory body with oversight on the Company's business.
- 9.4. Any retaliation, including, but not limited to, any act of discrimination, reprisal, harassment, suspension, dismissal, demotion, vengeance, or any other occupational detriment, direct or indirect, recommended, threatened, or taken against a Whistleblower because he/she has made a disclosure in accordance with this Policy will be treated as gross misconduct and dealt with accordingly.
- 9.5. Whistleblowers shall ensure that they do not make disclosures outside of the prescribed channels or their disclosures may not be protected.

10.0. Confidential Whistleblowing

The Company will respect and protect the confidentiality of Whistleblowers and gives assurance that it will not reveal the identity of Whistleblowers to any third party not involved in the investigation or prosecution of the matter unless the Whistleblower agrees otherwise.

However, where it becomes impossible for the concern raised to be investigated or resolved without revealing the identity of the Whistleblower or if the Company is bound legally to disclose the identity of the Whistleblower, the Company will confer with the Whistleblower on how to

proceed with the issue and will proceed without the Whistleblower suffering any reprisals or victimization.

12.0. Training and Awareness

All employees should be aware of the existence of the whistleblowing Policy and procedure. This can be achieved through regular compulsory training by the Compliance Department, newsletters, and emails. Annual declaration by all staff of having read and understood the Policy shall also be encouraged.

13.0. Establishing a Strong Whistleblowing Regime

13.1. It is the responsibility of the Board of Directors, through the Board Audit & Compliance Committee, to implement this Policy and continually affirm its support and commitment to the Company's whistleblower protection mechanism.

13.2. An office, department, or person(s) implicated by a report of a Whistleblower shall not be involved in the assessment, investigation, or any deliberation with respect to the assessment, investigation and executing the outcome of any such assessment or investigation.

13.3. The Company's whistleblower Policy shall be championed by the Compliance Department in collaboration with the Internal Audit Department and Human Resources Department.

14.0. Amendment/ Review

The Company reserves the right to amend this Policy every two (2) years, or any earlier period as the need may arise, subject to the approval of the Board Chairman and to communicate any amendment.

All suggestions for review and or amendments shall be forwarded to the Compliance Department for necessary action.

15.0. Contact

Any questions relating to the interpretation of this Policy should be directed to the Chief Compliance Officer or the Head of Internal Audit.

Approved by the Board of Directors on the 29th day of July 2022