

# **POLICIES AND PROCEDURES – WHISTLE- BLOWING**

## **1. Who should blow the whistle?**

*Any individual who has observed reportable misconduct , and, for staff of the Company, wherever conduct amounts to wrongdoing under policies of the Company has an obligation to report that conduct.*

## **2. Policy**

The main purpose of this policy is to give effect to the Mannai's duty of trust by protecting the interests of the shareholders. With this policy, the Company wishes to call upon others to assist it with its responsibility to discharge the duty of trust.

A disclosure will qualify for protection if the concern relates to unlawful conduct, financial malpractice or dangers to the public or the environment.

Conduct becomes reportable when it happens or when it is reasonably likely to occur. In determining whether to report conduct, harm is not only measured in terms of funds lost, or damage to a particular program / initiative / product / service, but harm may also be done to the integrity and reputation of the Company itself.

Reportable conduct falls into the following categories:

- illegal or unlawful
- unprocedural since it violates clearly communicated procedures
- unethical

Conduct constituting a gross waste of resources / assets is a reportable category in its own right.

## **3. Assurances of confidentiality and anonymity**

The Company wishes to assure the *safety* of whistle-blowing, and therefore undertakes to treat all whistle-blowing reports as either *confidential* or *anonymous*. The choice between confidential or anonymous whistle-blowing is that of the whistle-blower alone.

A whistle-blower may *choose to reveal his or her identity* when a report or disclosure is made. Should this be the case, the Company will respect and protect the *confidentiality* of the whistle-blower, and gives the *assurance that it will not reveal the identity of the whistle-blower to any third party*. The only exception to this assurance relates to an *overriding legal obligation* to breach confidentiality.

Alternative to confidential reporting, a whistle-blower may choose not to reveal his or her identity.

Both confidential and anonymous whistle-blowing options are aimed at *safe* reporting.

Where an individual makes a report under this policy in good faith, reasonably believed to be true, there will be no action taken against the reporter should the disclosure turn out to be *misguided* or *false*.

Reporting under this policy, however, in no way immunizes or shields a whistle-blower against action following from his or her intentional misconduct.

#### **4. Whistle-blowing procedures**

The Company has set up an *internal* whistle-blowing line for reporting to assure its maximum *effectiveness*. The contact person in this regard is Company's Senior Legal Adviser.

The Company is committed to *investigating and addressing* all cases of reported misconduct.

Periodic *feedback* to the Board will also be provided.