



Group Whistle Blowing Policy

Document History

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1. Introduction

Platcorp Holdings Ltd and its subsidiaries (hereinafter referred to as 'the Company') is committed to the highest possible standards of openness, probity and accountability. In line with the commitment, and as part of its governance arrangements, the Company encourages anyone (hereinafter referred to as the 'Whistleblower') who has a genuine concern about a misconduct which includes, but not limited to fraud, harassment, collusion, a malpractice, unethical or illegal conduct, improper or inappropriate conduct or breach of company policy to come forward without fear of reprisal and voice those concerns.

2. Purpose

This Whistle Blowing Policy (the "Policy") is intended;

- a) To encourage Employees, Senior Management, Directors and other relevant stakeholders (e.g. suppliers, customers, contractors) to report perceived misconduct of employees, Senior Management, Directors and other stakeholders across the company in a confidential manner without any fear of harassment, intimidation, victimization or reprisal of anyone for raising concern(s) under this policy; and
- b) To ensure the Company investigates misconduct and take steps to deal with such in a manner consistent with the Company's policies and procedures and relevant regulations

Employees, Senior Management, Directors and other stakeholders, are encouraged to raise genuine concerns internally about possible misconduct in the business, at the earliest opportunity. The procedures set out in the Policy should be used to report such concerns or complaints.

3. Objectives of this Policy:

The specific objectives of the policy are:

- a) To ensure all Employees, Senior Management, Directors and other relevant stakeholders feel supported in speaking up in confidence and reporting matters they suspect may involve misconduct within the Company ;
- b) To encourage all misconduct to be identified and challenged at all levels of the Company;

- c) To provide clear procedures for reporting and handling such concerns for misconduct; To proactively prevent and deter misconduct which could damage the Company`s reputation, performance and sustainability.
- d) To provide assurance that all disclosures will be taken seriously, treated as confidential and managed without fear of reprisal of any form; and
- e) To help promote and develop a culture of openness, accountability and integrity.

4. Scope of the Policy

Reportable misconduct covered under this policy includes but is not limited to: -

- a) All forms of financial malpractices or impropriety such as fraud, corruption, bribery, forgery, blackmail, theft, misappropriation of funds and classified documents;
- b) Failure to comply with legal obligations, statutes, and regulatory directives;
- c) Actions detrimental to Health and Safety or the Environment;
- d) Any form of criminal activity;
- e) Improper conduct or unethical behavior that undermines universal and core ethical values such as integrity, respect, honesty, accountability and fairness etc.
- f) Other forms of corporate governance breaches;
- g) Any breach of the Company Code of Conduct;
- h) Connected transactions not disclosed or reported in line with regulations;
- i) Insider abuse - where Employees, Senior Management, Directors and other relevant stakeholders with special access privileges and knowledge of operations and information use this knowledge and information to alter or disable security controls for their own benefit and to the detriment of the Company
- j) Non-disclosure of conflict of interest;
- k) Sexual or physical abuse/harassment of any staff, customer, job applicant, service provider and other relevant stakeholders;
- l) Abuse and misrepresentation of power and authority;
- m) Questionable accounting or auditing matters, internal controls breaches and significant breaches of Group policies; and
- n) Attempt to conceal any of the above listed acts.

5. Principles

- a) All concerns raised will be treated fairly
- b) Due process is followed for both the Whistleblower and the respondent, including the need for protecting confidentiality
- c) The Whistleblower will retain his/her anonymity unless he/she agrees otherwise
- d) The company will ensure that the Whistleblower is aware of the person handling the matter and how they may make contact with that person if any assistance is required.
- e) The company endeavors to ensure that the Whistleblower will not suffer any form of victimization as a result of raising a concern, based on good faith or reasonable belief, even if he/she is mistaken.
- f) If upon investigation of the disclosure, it is established that the subject disclosure was false, made deliberately in bad faith or out of malice, the Company may take appropriate disciplinary action.
- g) Upon conclusion of the investigation of the disclosure raised, the Company shall endeavor, where possible, to provide information, advice and feedback to the Whistleblower on the action being taken in response to the disclosure.

6. Reporting Procedure

- a) If the whistleblower believes reasonably and in good faith that any form of misconduct exists in the workplace, then he or she should report this immediately to the Chair of the Group Board Audit & Risk Committee on whistleblowing.platcorp@gmail.com, which can also be accessed through our website <https://www.platcorpgroup.com/our-policies/whistleblower-portal/>
- b) The whistleblower may also report the misconduct to **his or her own line manager**.
- c) If for any reason he/she is reluctant to report to the line manager, then he/she should report concerns to either the:
 - i. **Human Resources Manager and/or Group Executive Director (HR)**
 - ii. **Group Head of Internal Audit**
 - iii. **Group Executive Director, Legal & Corporate Governance or the Company Secretary through report@platcorpgroup.com**
- d) The Whistleblower's identity will not be disclosed without prior consent.

- e) Upon receiving a report, an acknowledgment email will be sent to the whistleblower, and the Executive Director of Legal & Corporate Governance will be notified to log the concern in the whistleblower register for investigation. For anonymous reports without contact details, the concern will still be entered into the whistleblower register for investigation.
- f) A management committee constituting Executive Director HR, Executive Director Legal and Corporate Governance and Group Head of Internal Audit; will review the reported concerns and determine the most effective approach to address them.
- g) The Whistleblower will be kept appropriately informed of the progress of the investigation and the action taken (if any) with respect to his/her disclosure.
- h) Any person who is subject of an investigation for misconduct shall be entitled to:
 - 1. information as to the substance of the report and/or other document arising out of any such investigation;
 - 2. reasonable opportunity to present their case to the Investigation team
- i) The Company's Board or the dedicated management committee will ultimately decide on the action to be taken. Depending on the nature and seriousness of the disclosure, the matter may be referred to the police or a law enforcement authority.
- h) Where concerns cannot be resolved without revealing the identity of the Whistleblower (e.g. if evidence is required in court), the Company will enter into a dialogue with the Whistleblower as to how the Company will proceed.
- i) The management committee shall on a quarterly basis share an update of all reported concerns, and actions taken to Board Audit and Risk Committee

7. Confidentiality

- a) All concerns will be treated in confidence and every effort made not to reveal the whistleblower's identity. However, whilst making all reasonable effort to maintain the confidentiality of the matter as a whole, at a certain stage in the investigation it may be necessary to make the origin of the complaint known to the person or persons the allegations relate to. This will be discussed with the Whistleblower at the time and consent shall be expressly sought from the Whistleblower before any disclosure of their identity/personal information is made to any other party unless compelled or permitted by law.

- b) Individuals should, however, be aware that their identity may be revealed by inference. Where this may be possible, the reporting individual will be informed in advance and their consent sought before any details are revealed.

8. Safeguards

The Company prohibits discrimination, retaliation or harassment of any kind against a Whistleblower who submits a complaint or report in good faith. If a Whistleblower believes that he or she is being subjected to discrimination, retaliation or harassment for having made a report under this Policy, he or she should immediately report those facts to the Chair of the Group Board Audit & Risk Committee. Reporting should be done promptly to facilitate investigation and the taking of appropriate action.

Any retaliatory actions against a Whistleblower will be subject to disciplinary measures which could include termination of employment.

9. Register of Concerns

- a) The Executive Director Legal and Corporate Governance will maintain a register of all concerns that have been raised under this policy. All Subsidiary Companies and any recipient of whistleblowing concerns, will notify the Executive Director Legal and Corporate Governance within 2 days of a concern being raised so that it can be included in this corporate register. This will include the following information:
- i. the date the concern was raised;
 - ii. a summary of the concern including the individuals involved;
 - iii. the date the investigation commenced;
 - iv. the outcome(s) of the investigation and
 - v. a summary of actions taken; and
 - vi. the date the individual raising the concern was notified of the outcome.
- b) The register maintained by Executive Director, Legal and Corporate Governance shall be a confidential register that will uphold all the principles of Data Protection as to its access, portability and destruction. Any employee who is granted access to the register shall uphold its confidentiality at all times.
- c) The Executive Director , Legal and Corporate Governance will provide a confidential summary report to the Group Board Audit Committee every three months.

12. Administration of the Policy

12.1 The Group CEO is the overall owner of this policy.

12.2 Group Executive Director legal and Corporate Governance is responsible for administration, revision, interpretation and application of this policy.

13. Review

This policy will be reviewed every two years from the date of approval or when necessitated by legal or internal operational changes. Any revised version shall be submitted to the board for approval.

14. Board Approval

This policy is approved by the Board of Directors on 4/12/2024 .

Signed:  _____
Chairman