



SAMEER AFRICA PLC

WHISTLE BLOWING POLICY

Adopted on .../..., 2021

Revised 20.05.2021

WHISTLE BLOWING POLICY

1.0 Introduction

An important aspect of accountability and transparency is a mechanism to enable all individuals to voice concerns internally in a responsible and effective manner when they become aware, or reasonably believe that others are not meeting the expected standards in business ethics.

At Sameer Africa Plc, we strive to maintain an open and sincere communication at all levels to ensure the achievement of our business objectives in a conducive work environment. This policy is therefore fundamental to our professional integrity. In addition, it reinforces the Company's core values of **Integrity, Respect, Innovation and Accountability**.

All employees and workers including contractors must act with integrity and honesty at all times. This helps our customers have confidence in us when entrusting us with their business.

What is whistleblowing?

Whistle blowing is the confidential disclosure by an individual of any concern encountered in the workplace relating to a perceived wrongdoing in the hope of stopping it. The Company considers such wrongdoing to include: -

- General malpractice, such as immoral, illegal, unethical practices. The word 'malpractice' means but is not limited to; breach of the law, theft, fraud, sexual harassment and other criminal activities.
- The disclosure may be about an incident, event or occurrence in the present or past.
- The misconduct could also be a violation of the law, regulation or a direct threat to public interest e.g. corruption or health or safety at the workplace.

2.0 Policy statement

The whistleblower policy is intended to encourage employees and others to raise serious concerns within the Company prior to seeking resolution outside the organization and to enable them to do so without fear of retaliation or victimization.

If an employee is not comfortable sharing the issue with her/his supervisor or is not satisfied with the supervisor's response, he/she is encouraged to directly contact the Head of HR or the Managing Director. If the disclosure concerns the Managing Director, an employee is entitled to share with the Chairman of Sameer Africa Plc. If the disclosure concerns other directors and / or the Chairman, the employee is entitled to share with the Chairman, Sameer Group. In response to any reports of wrongful conduct received, the Company will promptly carry out a full and fair investigation of the reported conduct and take appropriate actions based on the findings.

3.0 Authority for Whistle Blowing Policy

- The Head of Human Resources has the overall responsibility for the maintenance of the policy.
- General Managers and Departmental Managers however have a specific responsibility to facilitate the operation of this policy and to encourage and assure staff to raise concerns without fear of victimization.

4.0 Scope

This policy covers present permanent, temporary and seasonal employees (including student interns) throughout the Company. The policy also applies to third party partners including contractors and sub-contractors.

5.0 Key aspects of the policy

The following are the salient aspects of the whistleblowing policy: -

5.1 Anonymity

All whistle-blowers will be protected and the information held in strict confidence. Therefore, no one who reports in good faith wrongful conduct will suffer harassment, retaliation, or adverse employment consequence. A supervisor or manager who retaliates against a person who has reported a violation in good faith is subject to discipline up to and including termination of employment.

Whilst the Company encourages whistleblowers to identify themselves, anonymous calls and alerts will nevertheless be taken seriously and investigated fully.

5.2 Investigations

Any disclosures will be investigated fully including interviews with all the witnesses and other parties involved.

5.3 Good Faith

Anyone filing a complaint of wrongful conduct must be acting in good faith and have reasonable grounds for believing the information disclosed indicates wrongful conduct. Any allegations that prove to have been made frivolously, maliciously, or knowingly to be false will be viewed as a serious disciplinary offense.

5.3 Confidentiality

Reports of wrongful conduct or suspected wrongful conduct will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

5.4 False disclosure

Concerns that are raised maliciously will be investigated and the particular staff reporting the matter may be called to account for the action.

5.5 Personal or work related matters are excluded under this policy.

6.0 Procedure for raising a concern

Individuals may raise a concern through various official channels including email, suggestion / ideas boxes, open discussions etc. A special email address has been set up with restricted access to the Managing Director: whistleblowing@sameerafrica.com

6.1 Where an employee is aware of a matter that could be a malpractice, he/she should raise the concern with the immediate manager, or the Head of Human Resources. Where this is not possible because the line manager is involved in the alleged malpractice, the matter may be raised with the line manager's Manager and directly with the Head of Human Resources.

6.2 The concern may be raised verbally or in writing and should include full details of the matter and where possible supporting evidence.

6.3 Should an employee who has reported the matter as above not be satisfied with the action thereafter taken, he/she may report the matter to the Managing Director or Chairman, Sameer Africa Plc.

7.0 Review of this Policy

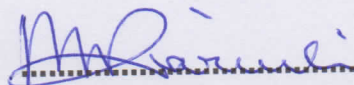
This policy shall be reviewed by the nominations and remuneration committee of the board and updated every three (3) years or as and when required to ensure that it is in line with all legal and regulatory requirements that may arise from time to time.

APPROVAL AND EFFECTIVE DATE

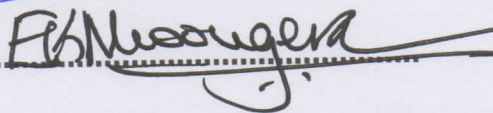
MANAGING DIRECTOR:


.....

CHAIRPERSON;
NOMINATIONS AND REMUNERATION COMMITTEE:


.....

BOARD CHAIRMAN:


.....

DATE:

.....