

# Whistleblower Policy

## 1. Scope

The policy applies to all employees (including those designated as temporary staff and trainees) of Currimjee Jeewanjee & Co Ltd and its subsidiaries herein after referred to as the “Company”, and those contractors working for the company, for example, security officers and cleaners. It also covers suppliers and those providing services under a contract with the company.

## 2. Purpose

The Company is committed to achieving and maintaining highest standards of openness, honesty and accountability with regard to behaviour at work, service to the public and in all its working practices.

The Company requires its employees to conduct themselves with integrity, impartiality and honesty in fulfilling their duties and responsibilities and comply with all applicable laws and regulations.

In line with that commitment, the Company expects employees and anyone associated with it and who have serious concerns about any aspect of practices encountered within the Company to come forward and voice those concerns within the defined process without fear of reprisals. The Whistleblower Policy is to support those wanting to raise such issues. It is recognized that for certain cases, it will be necessary to proceed on a confidential basis.

## 3. What is Whistleblowing?

Whistleblowing is defined as the disclosure in good faith, of information relating to questionable practices within a company. It usually involves the bypassing of normal reporting lines to report elsewhere within the company.

Whistleblowing encourages and enables employees to raise serious concerns within the company rather than overlooking a problem or 'blowing the whistle' outside. Employees are often the first to realise that there is something seriously wrong with certain practices. However, they may not express their concerns as they feel that speaking up would be disloyal to their colleagues or to the company.

## 4. Objectives of the Whistleblowing Policy

- i. To encourage employees to feel confident in raising, questioning and acting upon concerns regarding practices that run contrary to the Company's code of conduct, its policies and to other broader legal, ethical and governance-related principles.
- ii. To provide avenues for employees to raise concerns in confidence and receive feedback on any actions taken.
- iii. To ensure that employees receive a response to their concerns and that they are aware of how to pursue them if they are not satisfied.
- iv. To reassure employees that they will be protected from possible reprisals or victimization, if they have a reasonable belief that they have made an honest disclosure in good faith and in the interest of professional ethics, integrity and for the good of the business of the Company.
- v. To help protect the reputation of the Company.

## 5. Whistleblowing matters typically relate to:

- i. Conduct which is an offence or a breach of law.
- ii. Failure to comply with a legal obligation.
- iii. Disclosures related to miscarriages of justice.
- iv. Health and safety risks, including risks to the public as well as to other employees.
- v. Damage to the environment.
- vi. The unauthorized use of company funds/assets.
- vii. Possible fraud and corruption.
- viii. Conflicts of interest.
- ix. Sexual harassment.
- x. Unethical work conduct.
- xi. Actions which are unprofessional, inappropriate or conflict with a general understanding of what is right and wrong.

### **Note:**

- Other procedures are available to employees such as the Grievance Handling Procedure which relate to complaints about their own employment. Employees are encouraged to use the Grievance Handling Procedure for employment-related concerns and individual grievances.
- This Whistleblower policy does not replace other complaints procedures.
- The CJ HROC (Human Resources and Organization Committee) is the Ethics Committee of Currimjee Jeewanjee & Co Ltd and its subsidiaries and shall ensure the enforcement of the Code of Conduct by dealing with reports, as needed and major complaints and issues arising from the non-compliance of the Code of Conduct.

## 6. Safeguards

If the claim of questionable practice is substantiated and proved, appropriate disciplinary action will be taken against the responsible individual(s) up to and including termination of employment.

**Harassment or victimisation** - Harassment or victimisation for reporting concerns under this policy will not be tolerated. The company will take appropriate action to protect the employee when he/she raises a concern in good faith. Such cases will be treated with the Equal Opportunity Policy.

**Confidentiality** - The disclosure must be made as per the reporting process. Every effort will be made to treat the whistleblower's identity with appropriate regard for confidentiality. However, under certain circumstances and depending on the case, the employee may need to come forward as a witness to assist in the investigation.

It is important to note that when an employee raises a concern, he/she must:

- Disclose the information in good faith and in the interest of professional ethics, integrity and for the good of the business of the Company
- believe it to be substantially true
- not act maliciously or make false allegations, and
- must not seek any personal gain.

**Anonymous Allegations** - This policy encourages employees or office holders to put their names to allegations because appropriate follow-up questions and investigation may not be possible unless the source of the information is identified. Concerns expressed anonymously will not be entertained.

## 7. Reporting Process – How to raise a Concern?

An employee who reasonably believes that inappropriate business conduct is occurring should raise the concern with their immediate supervisor/ manager or their superior. This may depend, however, on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice. If the employee believes that management is involved, he/she should approach a more senior level of management within the company and/or the Chief Human Resource Officer and/or the Chairman of the Audit and Risk Committee for Currimjee Jeewanjee & Co Ltd.

The Chairman of the Audit and Risk Committee of Currimjee Jeewanjee & Co Ltd shall be notified of all financial or accounting irregularities or suspected irregularities. This policy does not supersede that requirement.

**The Whistleblower hotline is: 650 6200**

Concerns can also be made in writing to:

**The Chief Human Resource Officer**  
Currimjee Jeewanjee & Co Ltd  
Le Nénuphar, Currimjee Arcades, 1st Floor  
256 Royal Road, Curepipe  
Email: [vanesha.pareemamun@currimjee.com](mailto:vanesha.pareemamun@currimjee.com)

**And/or**

**The Chairman of the Audit and Risk Committee**  
Currimjee Jeewanjee & Co Ltd  
38 Royal St, Port Louis

Should the matter have a direct link with the Chief Human Resource Officer, the whistleblower is advised to report the case to the **Chairman of the HROC** at [ChairmanHROECommittee@currimjee.com](mailto:ChairmanHROECommittee@currimjee.com).

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## OWNERSHIP AND AUTHORISATION

Currimjee Jeewanjee and Company Limited is the owner of this document.

This document and all other related documents referred to herein may, from time to time, be reviewed in line with any changes in the law.

This Whistleblower Policy has been duly approved by the Human Resources and Organisation Board Committee of Currimjee Jeewanjee and Company Limited in **July 2021**.