



Group Whistleblowing and Complaints handling Policy

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1 Introduction

1.1 Definition

Whistleblower, which means an employee of the SBM reporting a breach or suspected breach and who is not entitled to investigate or to determine the appropriate corrective or remedial action that may be warranted;

Fraud, which means any act or omission, including a misrepresentation, that knowingly and recklessly misleads, or attempts to mislead, a party to obtain financial or other benefit or to avoid an obligation;

Corruption, which means the offering, giving, receiving, or soliciting, directly or indirectly, anything of value to influence improperly the actions of another party;

Misconduct, which means failure by staff to observe the Group's rules of conduct or standards of behaviors;

Coercive practices, which mean impairing or harming, or threatening to impair or harm, directly or indirectly, any party or the property of the party to influence improperly the actions of a party;

Collusive practices, which mean an arrangement between two or more parties designed to achieve an improper purpose, including influencing improperly the actions of another party.

Whistleblowing is when an employee raises a concern about a wrongdoing or malpractice in the workplace that has a public interest to it. GOV.UK defines whistleblowing as 'when a worker reports suspected wrongdoing at work'. These wrongdoings can be related to a range of issues, such as social care, financial mismanagement and environmental damage which should be addressed to the Group CEO's office or, if it is a complaint about the Group CEO, it should be addressed to the Chairman. The Whistleblowing and Complaints handling policy is in accordance to the Group's objectives to provide a working environment which promotes safety, teamwork and respectful treatment and to strengthen the Group's system of integrity and fight against corruption and related offences.

1.2 Purpose and Scope

In order to enhance good governance and transparency, the main aims of the policy are to provide an avenue for raising concerns and disclose any acts related to;

- Fraud

- corruption ,
- misconduct
- coercive practices
- collusive practices
- unlawful acts or orders requiring violation of a law
- gross waste
- mismanagement
- abuse of authority
- Any other activity which undermines the Group's operations and mission.

The Policy aims to promote the reporting of any breach or suspected breach of internal policies, laws and other behaviour contrary to SBM Mauritius' Code of Ethics and Conduct, which can result in potential financial or reputation loss, by employees who are aware of or become aware of such instances. It also protects employees who report occurrences of breaches or suspected breaches in good faith.

This Policy is not meant to question financial, commercial or other business decisions taken by SBM. Neither shall it be used to raise concerns about employees' conditions of service which shall be addressed to HR as stipulated in the HR Policy Mauritius Supplement.

2. Roles and Responsibilities – Group CEO

The registered allegation will be evaluated by the Group CEO to determine its credibility, materiality and verifiability to know whether there is a legitimate basis to warrant an investigation.

A preliminary evaluation will determine whether there are grounds for a more detailed investigation which will be based on information and documentary evidence provided by the whistle blower or the complainant and shall consider whether the disclosure has been made on the basis of reliable information and in good faith.

3. Protection of and Remedies for Whistle blowers and Complainants

The group will keep the identity of the whistleblowers or complainants confidential. Employees who report breaches in good faith and have reasonable grounds for believing that there is a breach or suspected breach, will be protected and their identity shall be kept confidential and shall not be revealed without their consent.

No victimization or disadvantage to the whistleblowers or complainants, that is, anonymity will be allowed, without fear of reprisal.

Where employees consider that they have been victim of reprisal, harassment, discrimination, retaliation or victimization for reporting a breach or have good reason to believe or fear that they are exposed to any such risk of reprisal, harassment, discrimination, retaliation or victimization as a result of their reporting an irregularity, they are entitled to complain to the Group CEO who shall institute the appropriate disciplinary measures.

In the event there has been an unauthorized disclosure of the identity of the whistleblowers or complainants, the Group CEO shall institute the appropriate disciplinary measure.

The employees reporting any breach/ suspected breach/ irregular activity shall be kept informed of the outcome of any investigation and actions SBM shall take.

4. Channels and Procedures

4.1 Report allegations or concerns

There are several channels through which employees may report breaches. Such reporting may be made by any means including verbal or written.

1. Staff may report allegations or concerns through the hotline, email and P.O Box facilities or, depending on the staff's choice, through an immediate supervisor or, a higher level supervisor within the organization or, to the Group CEO if the staff feels uncomfortable discussing the matter to a supervisor or foresees a potential conflict of interest.
2. Parties external to the Group shall feel free to use the hotline, email or P.O Box facilities to register and make allegations in strict confidence which will then be registered and screened by the Group CEO.
3. The registered allegation will be evaluated by the Group CEO to determine its credibility, materiality and verifiability to know whether there is a legitimate basis to warrant an investigation.
4. Adequate awareness training will be provided to employees on matters that can be reported through the mechanism and which should not (Eg. Personal salary, other staff salary, poor performance appraisal).

4.2 Hotline, email and P.O Box facilities

The channels available for the whistleblower are as follows:-

1. Email: whistleblowing@sbmgroup.mu
2. P.O. Box 11, Caudan, Port-Louis
3. Hotline: 8002111 (Toll-free)

1. The existence of the above facilities is a deterrent in itself and a strong reminder to colleagues of an organizational commitment to fight corruption and fraud.
2. The facilities shall be operated by the office of the Group CEO and shall entail round-the-clock confidential service available 24 hours a day and 365 days a year.
3. Complaints will be receivable in Creole, English and French.
4. In the case of a power cut, an automated message shall be displayed.

4.3 Behaviours

1. By communicating the reasons and benefits of having a whistleblowing and complaints helpline, this will encourage reports and concerns.
2. Culturally, this helpline underlines the culture of openness and honesty that we want across the Group and is the cost effective solution as well.

5. Reporting updates

Corporate Governance Conduct Review Committee (CGCRC) Reporting:

Significant concerns shall be raised to the Board by the Group CEO, he shall maintain a register for all allegations and recorded actions and report all findings to the CGCRC.