

## **WHISTLEBLOWERS' POLICY**

### **PURPOSE**

Whistle Blowing is an important aspect of Corporate Governance and transparency as a mechanism to enable staff and other members of the Company to voice concerns in a responsible and effective manner. It is a fundamental term of every contract of employment that an employee will faithfully serve his or her employer and not disclose confidential information about the employer's affairs.

Nevertheless, where an individual discovers information which they believe shows unlawful or unethical behaviour within the organization then this information should be disclosed to the Executive Human Resource Administrator without fear of reprisal, and there should be arrangements to enable this to be done independently of line management (although in relatively minor instances the line manager would be the appropriate person to be told).

It should be emphasized that this policy is intended to assist individuals who believe they have discovered any information or activity that is believed to be unlawful or unethical. The information of unlawful or unethical behavior can be classified as violation of company policy/rules, laws, regulations, or threat to public interest/national security, as well as fraud and corruption. The policy is not designed to question financial or business decisions taken by the Company nor should it be used to reconsider any matters which have already been addressed under harassment, complaint, disciplinary or other procedures.

Board members, officers, employees and contractors have a duty to make a report internally in respect of any activities, actions and inaction that they believe to be unlawful or unethical rather than airing such concerns outside of the company. They are also expected to report concerns about violations of Honey Bun Limited's code of ethics or suspected violations of law or regulations that govern its operations.

The Company will treat all such disclosures in a confidential and sensitive manner. The identity of the individual making the allegation may be kept confidential so long as it does not hinder or frustrate any investigation. However, the investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence required.

### **SCOPE**

This policy is designed to enable employees of the Company to raise concerns internally and at a senior management level and to disclose information, which the individual believes is evidence of unlawful or unethical activity or behaviour. This policy is intended to cover concerns, which are in the public interest and may at least initially be investigated separately but might then lead to the invocation of other procedures e.g. disciplinary.

**Honey Bun Ltd.**

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These concerns could include: -

- Corruption or fraud
- Failure to comply with a legal obligation or Statutes
- Dangers to Health & Safety or the environment
- Criminal activity
- Unlawful or unethical behaviour
- Attempts to conceal any of these.

**PROCEDURE**

- The complainant must pass on the relevant information in writing as soon as is reasonably possible to the Executive Human Resource Administrator.
- Complaints against the Chief Executive Officer should be passed to the Chairman or the Board of Directors who will nominate an appropriate investigating officer.
- All reports are encouraged to be disclosed in writing.
- The Executive Human Resource Administrator will consult with the Chief Executive Officer to decide on the action to be taken. If the complaint is shown to be justified, then they will invoke the disciplinary or other appropriate Company procedures.

It is contrary to the values of Honey Bun Limited for anyone to retaliate against any board member, officer, employee or contractor who in good faith reports unlawful or unethical behavior. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

**CORRECTIVE ACTION**

If the procedures are not upheld, then an individual has the right to elevate the report to a more senior level.

**VERIFICATION**

The Chairman/Board of Directors/Chief Executive Officer reserve the right to make any decision based on the findings of the Executive Human Resource Administrator.

**DOCUMENT CONTROL**

<b>Date</b>	<b>Prepared By</b>	<b>Approved By</b>	<b>Detail of Change</b>
June 6, 2017	Paula Graham-Haynes	Michelle Chong	New
August 28, 2020	Michelle Chong		Reviewed with no changes