



# INFORMATION SECURITY POLICY

**VERSION 2**  
SEPTEMBER 2022

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## WHISTLEBLOWING POLICY

### 1. INTRODUCTION

Loinette Capital Limited (“LCL” or alternatively the “Company”) holds a Global Business License (Number C118017547) under the Mauritius Financial Services Act 2007 and is regulated by the Financial Services Commission. It also holds a Credit Finance License under Section 14 of the Mauritius Financial Services Act 2007 and the Financial Services (Consolidated Licensing & Fees) Rules 2008. The National Code of Corporate Governance 2016 applies to the Company.

The principal activity of the Company is to provide its clients with asset backed finance for the acquisition of machinery, vehicles and equipment.

As a responsible and licensed company, LCL constantly seeks opportunities to create and sustain value for all its stakeholders and reporting and addressing violations of the laws is of vital importance in protecting our reputation.

This Whistleblowing Policy sets out LCL's commitment to promote accountability and transparency in its way of doing business. LCL believes that providing a confidential and anonymous channel for all stakeholders [ internal and external] to express their concerns about any perceived wrong-doings, malpractices or improprieties is instrumental for maintaining sound, ethical and sustainable business practices and ensuring continuous improvement in its processes. This policy accordingly provides a mechanism at the level of LCL for all relevant stakeholders to raise, in good faith, a genuine reportable whistle blower concern without any fear of retaliation.

This Policy is designed to:

- 1.1. support LCL's values;
- 1.2. provide a transparent and anonymous reporting process to encourage employees and other relevant external stakeholders to safely and confidentially raise concerns of illegal, unethical and fraudulent behaviour, as well as any form of misconduct or other suspected wrongdoing within the organization, without fear of suffering retribution; and
- 1.3. establish an effective whistleblowing system which would contribute to a sound corporate culture.

### 2. SCOPE OF APPLICATION

This Policy applies to all employees and stakeholders of LCL as well as its main subsidiaries.

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### 3. POLICY STATEMENT

LCL and its subsidiaries (together referred to as "LCL Group") are committed to conduct their business operations to the highest standards of good governance, integrity, professionalism, and ethics. Having our people at heart and remaining ethical and sustainable in fulfilling our corporate responsibilities ranks high in our priority. Any actions which may be prejudicial to the reputation of LCL Group shall be dealt with seriously.

LCL is committed to implement a whistleblowing mechanism covering all operations within the LCL Group, with the objective of aligning itself with the recommendations of the National Code of Corporate Governance.

Through its whistleblowing mechanism, LCL provides an avenue to all of its stakeholders to report concerns, in good faith. It is also aimed at its employees to act responsibly without the risk of subsequent victimization or discrimination.

The whistleblowing mechanism applicable at the level of LCL is detailed in annex I. It would be the responsibility of each of the Subsidiaries and investee companies to leverage on this policy to develop and maintain their own whistleblowing mechanisms applicable and adapted to their business context, using this framework as a guideline. To ensure effectiveness and continuous improvement of our whistleblowing process, it is recommended that, on an annual basis, the whistleblowing systems should be assessed, and a status report be submitted to the Company Chairman at the end of each financial year.

### 4. DEFINITION OF RESPONSIBILITIES

It is the prerogative of the respective management of each LCL Group entity to ensure the approval and implementation of a whistleblowing policy within the entities they are responsible for.

### 5. REVIEW MECHANISM

This policy will be reviewed and edited as and when required.

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## ANNEXURE 1

### THE WHISTLEBLOWING MECHANISM

#### 1. THE SCENARIOS FOR WHISTLEBLOWING SYSTEMS ACROSS THE LCL GROUP

We expect that multiple scenarios will be adopted while implementing the whistleblowing mechanisms across the group, depending on legal framework, geographical context and organizational structure. This document describes the whistleblowing mechanism at LCL level and allows all its stakeholders to raise concerns in full confidence and without any fear of retaliation.

#### 2. GENUINE REPORTABLE CASES

Cases that are reportable under this policy includes any of the following acts that the whistle blower suspects have been committed or is likely to be committed:

- Bribery
- Fraud
- Corruption, blackmail or misuse of office, including any act of corruption under the Prevention of Corruption Act 2002
- Theft
- Financial Mismanagement
- Discrimination
- Harassment/threat
- Retribution or retaliation
- Environment, Health and Safety
- Bullying
- Data Breaches
- Insider trading
- Anti-competition practices
- Illegal or criminal offences
- any serious breach of internal policies
- any deliberate failure to comply with any legal or regulatory obligations and
- concealment of information relating to any of the above.

Genuine Reportable cases shall exclude any personal work-related grievance, an interpersonal conflict or a decision relating to personal employment.

#### 3. COMMUNICATION OF WHISTLEBLOWING POLICY

This Policy shall be readily accessible to all stakeholders through LCL's website and LCL recommends each of its subsidiaries and investee companies to communicate same through their channels.

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#### 4. WHO CAN BE A WHISTLEBLOWER?

The Whistleblowing mechanism should be open to any stakeholders including, but not limited to current or former employees, directors, contractors, subcontractors, officers, customers, suppliers, service providers and the public.

#### 5. GRIEVANCE PROCEDURE FOR REPORTING A CASE

5.1. Complete and submit an online survey form on the following link:

<https://www.loinettecapital.com/contact/> ; or

5.2. Send the completed online form addressed to the **Chairman of the Risk Committee**, at the postal address shown below:

Postal address	Loinette Capital Limited, Office B5-04, Level 5 – Tower C, 1 Exchange Square, Wall Street, Ebene, 72201 – Mauritius
Email address	<a href="mailto:derek.crandon@loinettecapital.com">derek.crandon@loinettecapital.com</a>
Contact number	+230 454 1024

5.3. Alternatively, if the person feels that the above alternatives are not suitable, he or she may report same to the Chairman of the Company at the following address (with note on envelope label "**Strictly Private and Confidential — to be opened by the Addressee Only**").

5.3.1 Mr. Derek Crandon  
c/o Loinette Capital Limited  
Office B5-04, Level 5-Tower C  
1 Exchange Square, Wall Street  
Ebene, 72201 – Mauritius

5.4. The role of the Risk Committee is only to screen the complaint to determine whether the complaint is a genuine complaint worth investigating and actioning. If so, the Risk Committee shall forward the complaint to the Chairman of LCL. Within seven (7) working days of receiving the concern (unless anonymous), the whistle blower should receive an acknowledgement of receipt, informing him / her of the next steps.

#### 6. ANONYMITY & MATERIALITY OF INFORMATION PROVIDED

You can communicate anonymously, or you can provide your details, whichever is your preference. In both cases, your report will remain anonymous, and your identity will be protected, unless disclosure is necessary under applicable laws. To ensure confidentiality and avoid fear of retaliation or fear of losing relationships at work and outside work, anonymous whistle blowers may submit reports in writing as per channels identified above with sufficient details and material for investigation to be provided.

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Information pertaining to reports submitted under this Policy will be retained for a period of seven years from the date of the report pursuant to the related investigations.

## **7. PROTECTION OF WHISTLEBLOWERS**

LCL will treat all such disclosures in a confidential and sensitive manner and will not permit any retaliation against any employee or other person who, in good faith, has reported a Genuine Reportable Case, even if the facts reported proves to be inaccurate.

However, any employee who makes an allegation maliciously or in bad faith may be subject to disciplinary actions or in the case of an external stakeholder we reserve the right to take the necessary legal actions.

## **8. INVESTIGATIONS**

Upon receipt of a complaint, the Chairman of the Risk Committee will:

- 8.1. Decide on appropriate actions to be conducted to resolve the issues;
- 8.2. channel the complaint to the relevant parties for investigation; and
- 8.3 ensure that the necessary investigations are carried out.

The ultimate decision to investigate will rest with the Chairman of LCL. The investigation team will be under a duty to maintain the confidentiality of the matter and of the whistle blower and report back to the Risk Committee of LCL.

## **9. REPORTING AND MONITORING**

To ensure that complaints are managed effectively, all allegations must be appropriately considered, investigated, and recorded. The whistle blower should be kept informed of the progress of investigations, if any. The whistle blower shall receive a report regarding the investigation, disposition, or resolution of the issue within 5 working days of the complaint.

## **10. EXTERNAL COMPLAINTS ESCALATION**

Where the whistle blower feels that insufficient action has been taken in response to his/her complaint, the matter may be further reported to an external source (such as the Financial Services Commission of Mauritius or the Independent Commission Against Corruption). Prior to escalating any complaint to an external source, the whistle blower should ensure:

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- 10.1. he/she has followed the process for internal reporting (please refer to clause 5 above);
  - 10.2. he/she reasonably believes the information and any allegations in it are substantially true; and
  - 10.3. he/she reasonably believes that the external source is the appropriate authority for resolving the issue in question.

The Risk Committee of LCL should be kept informed of the number and nature of all breaches and concerns raised, as well as a high-level progress report on material cases received.