

medicine

**WHISTLEBLOWING
POLICY &
PROCEDURES**

WHISTLEBLOWING POLICY & PROCEDURES

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WHISTLEBLOWING POLICY & PROCEDURES

1. INTRODUCTION

Medine Limited (Medine or the “Company”) and all its subsidiaries (collectively known as the Medine Group) are committed to achieve and maintain the highest professional and ethical standard in accordance with applicable laws and regulations. Integrity is one of the four values driving our business behaviour and is rooted in our management system for the success of businesses of the Group as a whole. Any action, which might be prejudicial to the Group’s integrity and reputation, will be dealt with.

The Medine Group has implemented a “Whistleblowing Policy” for use by all employees and any other party (who may or may not have business relationship with the Group) wishing to raise genuine concerns in the best interest of the Group. Whistleblowing forms part of Medine’s fraud prevention and detection strategy.

The Policy provides guidance and is a channel for effective communication to assist employees and any other party who believe they have discovered malpractices or improprieties. It is in accordance with the requirements of the Mauritian Code of Corporate Governance which state:-

The National Code of Corporate Governance for Mauritius (2016)

Principle 4 - Director Duties, Remuneration and Performance under implementation guidance of the Code of Ethics:

“All Boards are encouraged to put whistleblowing procedures in place and to describe these in their Code of Ethics.”

The arrangement in this document is not designed to question strategic, financial or business decisions taken by Medine and its subsidiaries in the normal course of their operations.

The latest version of this document can be viewed on the Medine’s Group website.

2. DEFINITION

Whistleblowing is defined as the disclosure by employees or any other party in good faith on questionable practices. It involves bypassing the normal reporting lines elsewhere within the organisation.

Disclosures of information could be in relation to any of the following:

- Breach of rules;
- Criminal offence (fraud and/or theft);
- Non-compliance to legislations and regulations;
- Non-compliance to Medine Group Policies and Procedures;
- Deliberate and continuous override of internal control procedures;
- Health and Safety dangers;
- Act of dishonesty; and
- Behaviour/action that harms or is likely to harm the good standing, reputation and financial well-being of the Medine Group.

It is advisable that the disclosure/reporting includes information like “who, what, when, where, how” and with relevant supporting documents (where applicable).

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Exclusions on disclosures:

- Employment related concerns and individual grievances do not form part of the whistleblowing policy & procedures. These should continue to be reported through the normal reporting channels within the organisation.
- If disclosure relates to a concern with categories not described above, then the employee should first report the matter in confidence to:
 - o Group HR Manager for HR concerns;
 - o Chief Financial Officer for Finance concerns; and
 - o Chief Executive Officer and /or Group Chief Operational Officer for Operational concerns.

3. POLICY

- The Medine Group whistleblowing policy applies to any other party and all employees of the Medine Group, including permanent and non-permanent.
- All Medine Group employees and other party are encouraged to raise concerns about any practices that they feel might be of questionable ethical nature or of legal standards.
- Any approach by an employee or any other party in connection with this policy will be treated in with the strictest confidentiality. Moreover, employees should not discuss reported concerns with colleagues, third parties or the media.
- Appropriate protection will, if necessary be provided to any employee or any other person who raises concern in good faith. Medine will not tolerate any attempt on the part of anyone who applies a sanction, disadvantage, discrimination, or harassment (including informal pressures) against a whistleblower acting in good faith.
- If proven that an employee has made an allegation maliciously or in bad faith, the person will be subject to disciplinary action or any such legal action as the Group may be advised and/ or may lead to termination of contract of employment.
- Concerns expressed anonymously will be explored into appropriately.
- Concerns raised will be investigated (if required) independently by the Head of Internal Audit & Risk Management or by an independent third party and be reported to the Medine Group’s Audit & Risk Committee on a timely basis.
- The channel for reporting all concerns as defined in section 2 above, on particular matter of exceptional gravity or sensitivity, should be reported to the:



4. RESPONSIBILITIES

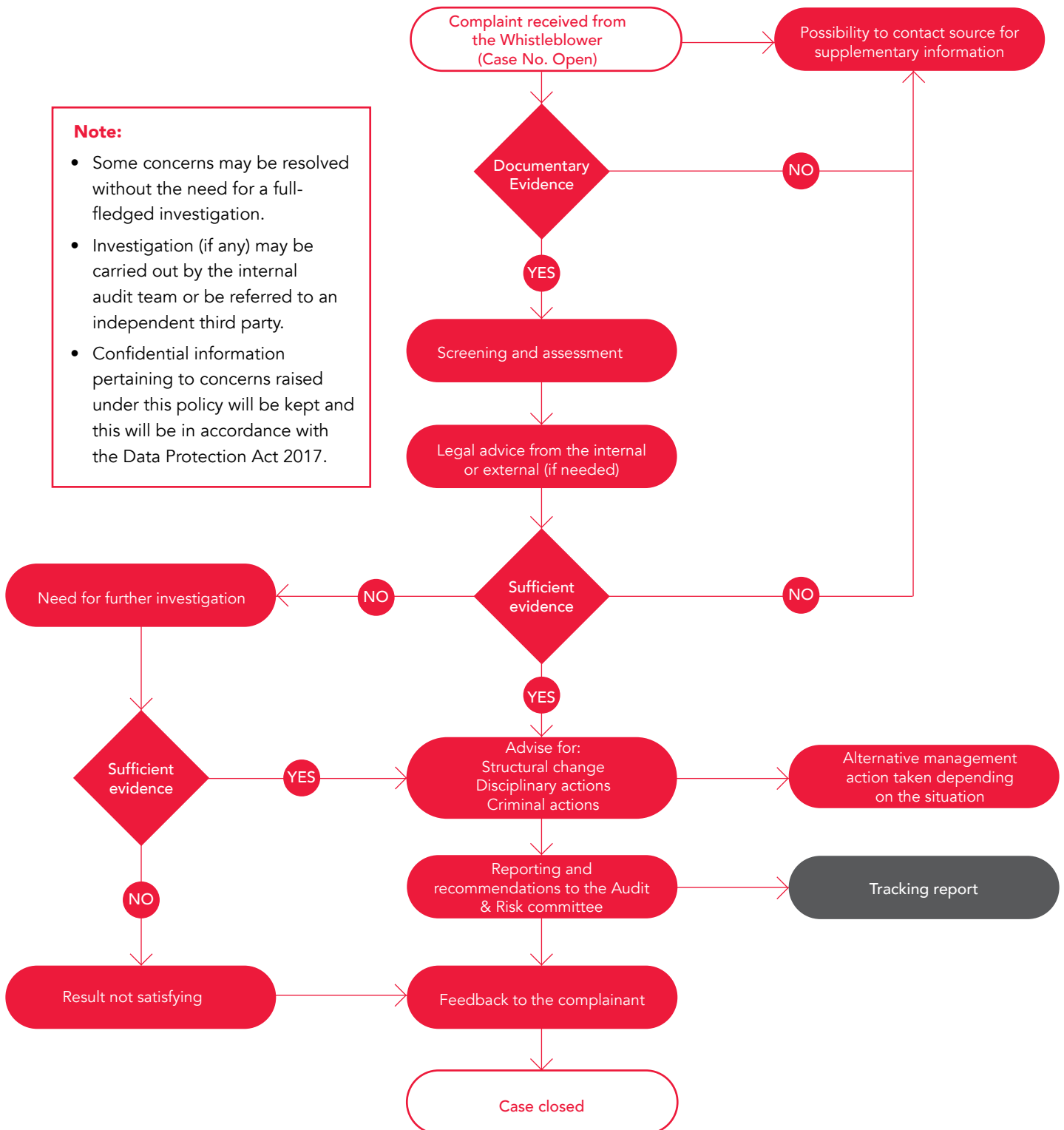
This policy applies to Medine Group, all clusters and Business Units. It is the responsibility of all employees and Directors to ensure compliance.

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5. PROCEDURES FOR WHISTLEBLOWING

Note:

- Some concerns may be resolved without the need for a full-fledged investigation.
- Investigation (if any) may be carried out by the internal audit team or be referred to an independent third party.
- Confidential information pertaining to concerns raised under this policy will be kept and this will be in accordance with the Data Protection Act 2017.



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6. CONTACT DETAILS FOR REPORTING

Where the concern/ whistleblow is escalated to the persons below, contact should be made on either via the email addresses or postal address or whistleblowing box:-

Head of Internal Audit & Risk Management

Email address:	whistleblowing1@medine.com
Postal address:	Head of Internal Audit & Risk Management Medine Limited 5 Unicity Office Park Riviere Noire Road, Unicity 90203 Mauritius

Chief Executive Officer

Email address:	whistleblowing2@medine.com
Postal address:	Chief Executive Officer Medine Limited 5 Unicity Office Park Riviere Noire Road, Unicity 90203 Mauritius

Chairman of the Audit & Risk Committee of Medine

Email address:	whistleblowing3@medine.com
Postal address:	Chairman of the Audit & Risk Committee Medine Limited 5 Unicity Office Park Riviere Noire Road, Unicity 90203 Mauritius

(All envelopes should be labelled "strictly Private and Confidential – to be opened by the Addressee Only)

A whistleblowing box will be made available to employees and to other parties at the business unit.

