



WHISTLEBLOWING POLICY

Purpose

The purpose of this policy is to establish a structured and safe mechanism for employees or individuals within the organization to report concerns or wrongdoing they have observed without fear of retaliation. We encourage transparency, accountability, and ethical behaviour within the organization.

Scope

This policy applies to all employees, all stakeholders, and any other individuals who have a deep respect to fundamental values.

Policy Statement

Cernol Ltd is committed to maintaining the highest standards of ethics, integrity, and accountability. This Whistleblowing Procedure provides a clear and confidential process for reporting concerns without fear of retaliation.

Roles and Responsibilities

The Whistle-blower's responsibility is to report the following range of concerns, including, but not limited to:

- Financial misconduct, such as fraud, embezzlement, or misappropriation of assets.
- Violations of applicable laws, regulations, or company policies.
- Unethical conduct, such as fraud, theft, bribery, corruption, or conflicts of interest.
- Discrimination, harassment, or other forms of misconduct in the workplace.
- Health and safety hazards that pose risks to employees or the public.
- Environmental violations or concerns.
- Any other actions that may harm the Company, its stakeholders, or the public interest.

Procedures

Confidential Reporting:

The Company provides multiple channels for reporting concerns, allowing individuals to choose the most comfortable and confidential method:

- Reporting to immediate supervisors or managers.
- Reporting to the Human Resources Manager or Group Human Resource Manager.
- Reporting concerns directly to the GM, CEO, or to the Board of Directors in case of a conflict of interest with immediate supervisors.

The identity of whistle-blowers will be kept confidential to the extent possible, subject to applicable laws and the need to conduct a thorough investigation.

Investigation Process:

Upon receipt of a whistleblowing report, Cernol Ltd will initiate a prompt, impartial, and confidential investigation. The investigation will be conducted by a designated individual or team to determine the appropriate course of action. Investigation Process will be considered, only in cases where evidence can be demonstrated. Management reserves the right not to provide detailed feedback to the whistle blower depending on circumstances.



No Retaliation:

Cernol Ltd strictly prohibits retaliation against whistle blowers. Any employee found engaging in retaliation will be subject to disciplinary action, up to and including termination.

False Reports:

False or malicious reports made with the intent to harm or harass others will not be tolerated. Individuals found making false reports will be subject to disciplinary action.

Record-Keeping:

All whistleblowing reports, investigations, and related documentation will be appropriately documented and securely maintained.

Awareness and Communication

Cernol Ltd will provide training and awareness programs periodically to ensure that individuals understand their rights and responsibilities under this policy.

We will communicate and promote awareness of this Whistleblowing Policy to all employees and stakeholders to encourage a culture of integrity and accountability.

Monitoring and Review

The Whistleblowing Policy will be reviewed periodically to ensure its effectiveness and compliance with relevant laws and regulations. Any necessary updates will be made accordingly.

Date: September 2023

Approved by:

Olivier Constantin
General Manager