

Policy on Whistleblowing

LOLC HOLDINGS PLC

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Policy on Whistleblowing

1. Purpose & Policy

LOLC Holdings PLC is fully committed to fostering a culture of honesty, integrity and transparency. We encourage anyone to report any concerns regarding unethical or illegal conduct without fear of retaliation and are committed to protect whistle blowers to the full extent provided by the law.

LOLC Holdings PLC established this policy to encourage and facilitate the reporting of fraud, violations of laws and regulations, misconduct, unethical behaviour and any form of harassment within the organisation. This policy establishes the protection and safeguards to protect whistle blowers.

2. Scope

This policy applies to all employees and stakeholders of LOLC Holdings PLC. It covers all forms of fraud, illegal activities misconduct, corruption, harassment, safety violations and breaches of company policy & procedures.

3. Whistleblowing

Whistleblowing is an act of reporting suspected fraud, irregularities misconduct or unethical activities within the organization or committed as part of the operations. This includes concerns about but not limited to;

- Fraud or financial irregularities
- Harassment or discrimination
- Breach of confidentiality
- Safety or health regulation violations
- Violations of laws or regulations or company policy.
- Unethical practices
- Sabotage

4. Reporting Procedure

Anyone who has knowledge of any wrong doing is required and has a responsibility to report such concern or irregularity:

1. Report such concerns directly to your immediate supervisor or manager. If the above is not possible or you have reason to believe that the supervisor is involved.
2. Report to head of ERM (Enterprise Risk Management - LOLC Group)
3. A report can be submitted in writing either signed or anonymous, or verbally
4. All your complaints /reports will be acknowledged and an investigation will be initiated.

5. Confidentiality

- All reports will be treated with the utmost confidentiality. The identity of the whistle-blower will be protected to the extent provided by law.
- Whistle-blowers may be requested to give evidence as required by the investigating officer or inquiring officer consistent with the need to conduct a thorough investigation.

6. Protection of whistle-blowers

- LOLC Holdings PLC strictly prohibits any form of retaliation against whistle-blowers who report concerns in good faith. This includes protection from harassment, discrimination, or any adverse employment actions.
- Any retaliation can be reported to head of HR/CEO or head of ERM (Enterprise Risk Management) LOLC Group and if such allegation is proven will result in disciplinary action, up to and including termination of the offending party.

7. Investigation Process

- Upon receiving a report/complaint, LOLC Holdings PLC will appoint an investigation officer considering the nature and the complexity of the issue reported.
- The investigation officer will conduct a prompt, fair, and impartial investigation.
- All parties involved in the investigation will be expected to cooperate fully.
- The investigation's findings will be documented, and appropriate actions will be taken based on the outcome.

8. Policy Review

This policy shall be reviewed periodically or as required.