



1. Overview

The Whistleblower Protection Policy (“the Policy”) is one of a number of Policies and Codes that promotes a culture of compliance, honesty and ethical behaviours within the Petratherm Limited and its subsidiaries (The Group).

The Group’s aim is to encourage staff to report any wrongdoing in good faith and in an environment free from victimisation so that the Board and Senior Management can adequately manage risk and cultural issues within the Group.

2 Scope

The Policy applies to all staff and consultants in all businesses and subsidiaries (including all offshore locations) within the Petratherm Group.

It sets out the minimum requirements for the Petratherm Group. Where the Company operates overseas jurisdiction and that overseas jurisdiction imposes a higher standard, those local standards are deemed to be incorporated into and to supplement the Policy.

3. Rationale

The Board of Directors and Management encourage all staff to report wrongdoing. All staff should feel confident and comfortable about reporting wrongdoing.

The Board of Directors and Senior Management are committed to protecting and supporting the dignity, wellbeing, career and good name of anyone reporting wrongdoing.

4. What is “wrongdoing”?

Examples of wrongdoing include, but are not limited to, the following:

- a breach of regulations or laws;
- a breach of Petratherm’s Policies and Codes;
- dishonest or corrupt behaviour, including soliciting, accepting or offering a bribe, facilitation payments or such other benefits;
- fraudulent activity;
- illegal activity (including theft, drug sale / use, violence or threatened violence and property damage);
- impeding internal or external audit processes;
- improper behaviours relating to accounting, internal accounting controls, actuarial, or audit matters;
- an activity that poses a substantial risk to the environment;
- a serious impropriety’;
- conduct endangering health or safety;
- a substantial mismanagement of Petratherm’s resources;
- conduct that is detrimental to Petratherm’s financial position or reputation;
- bullying, intimidating or harassing behavior; and
- concealment of wrongdoing.

5. Reporting wrongdoing

A staff member can report wrongdoing to the Chairman of the Board of Directors and/or the Chairman of the Audit Committee.

Any staff member that submits or receives a report must treat the matter confidentially.

The Policy does not prevent a staff member from reporting wrongdoing to a regulator under an applicable law or prudential standard.

6. Investigating wrongdoing

Investigations of wrongdoing will be conducted by the Chairman of the Board of Directors and/or the Chairman of the Audit Committee in a manner that is confidential, fair and objective. The investigation processes will vary depending on the nature of the wrongdoing and the amount of information provided.

For a report to be investigated, it must contain sufficient information to form a reasonable basis for investigation.

A Whistleblower will always be informed of the outcome of the investigation. In cases where the Whistleblower Investigator has not substantiated the allegations, an appropriate explanation will be made to the Whistleblower, subject to any privacy and confidentiality rights.

7. Whistleblower Protection

Any staff member reporting wrongdoing can seek advice from the Chairman of the Board of Directors and/or the Chairman of the Audit Committee prior to or after making a report.

The Chairman of the Board of Directors and/or the Chairman of the Audit Committee can protect the Whistleblower in a number of ways including, but not limited to, the following.

- ✓ Ensuring confidentiality in the investigation.
- ✓ Protecting, as far as legally possible, the staff member's identity.
- ✓ Offering a staff member leave of absence while a matter is investigated.
- ✓ Relocating the staff member or other staff to a different work group or department.

8. Review and Publication of this Policy

- 8.1** This Policy and its effectiveness will be reviewed at least annually by the Board.
- 8.2** The Policy will be made available to Petratherm Limited's Shareholders on request.
- 8.3** A copy of this Policy will be made available on Petratherm Limited's website.

Signed, on behalf of the Board of Directors

A handwritten signature in cursive script, appearing to read 'Derek Carter', written in black ink.

Derek Carter (Chairman)

Date: 15 July 2021