



## **CWG PLC WHISTLEBLOWER POLICY**

This policy is intended to encourage directors, employees, contractors, suppliers, partners and consultants to report suspected or actual occurrence(s) of illegal, unethical or inappropriate events (behaviors or practices) without retribution.

1. The Whistleblower should promptly report the suspected or actual event to his/her supervisor. Where the whistle blower is a contractor, supplier, partner and consultant he/she should promptly report the suspected or actual event to Management.
2. If the Whistleblower would be uncomfortable or otherwise reluctant to report to his/her supervisor, then the Whistleblower could report the event to the Internal Auditor. Where the whistle blower is a contractor, supplier, partner and consultant he/she should report to the Internal Auditor
3. The Whistleblower can report the event with his/her identity or anonymously.
4. The Whistle blower shall receive no retaliation or retribution for a report that was provided in good faith – that was not done primarily with malice to damage another individual or the organization.
5. A Whistleblower who makes a report that is not done in good faith is subject to discipline, including termination of the Board or employee relationship, or other legal means to protect the reputation of the organization and members of the Board and staff.
6. Anyone who retaliates against the Whistleblower (who reported an event in good faith) will be subject to discipline, including termination of Board or employee status.
7. Crimes against person or property, such as assault, rape, burglary, etc., should immediately be reported to the relevant law enforcement agency.
8. Supervisors, managers and Internal Auditors who receive the reports must promptly act to investigate and/or resolve the issue.
9. The Whistleblower shall receive a report within five (5) business days of the initial report, regarding the investigation, disposition or resolution of the issue.

10. If the investigation of a report, that was done in good faith and investigated by internal personnel, is not to the Whistleblower's satisfaction, then he/she has the right to report the event to the appropriate legal or investigative agency.
11. The identity of the Whistleblower, if known, shall remain confidential to those persons directly involved in applying this policy, unless the issue requires investigation by law enforcement, in which case members of the organization are subject to subpoena.
12. The whistle blower should make his/her report under this policy to the dedicated email [whistleblower@cwg-plc.com](mailto:whistleblower@cwg-plc.com)

**APPROVED BY THE BOARD OF DIRECTORS ON THE 18<sup>th</sup> DAY OF OCTOBER 2018**