

	HR POLICY MANUAL		
	Whistle Blowing Policy	DOCUMENT No: HR 03	REF No: HR/2024/03

Policy Statement

Uga Escapes (Private) Limited is committed to the highest possible standards in accordance with the company's policies, Code of Ethics and Business Conduct. It is the responsibility of all employees to report any violation of company policies, rules & regulations.

This policy sets out the procedure by which employee can report and receive feedback on any violations of Uga's workplace practices and norms while offering an avenue of escalation where employees do not feel that prior reporting was not taken seriously by their immediate supervisor. In addition to this the policy aims to reassure all employees that they will be protected from reprisals or victimisation for whistle-blowing made in good faith.

1. Procedure

There are existing procedures in place to enable employees to lodge a grievance relating to their own employment. This whistle blowing policy covers concerns about malpractices, criminal or unethical conduct within the organisation as outlined below, and could affect customers / guests, service users, members of the public or other employees / contractors.

The concern raised may be about an action that:

- Is unlawful (including criminal offences or breaches of civil laws and regulations).
- Falls below established standards or practice (including the violation of Uga policies and procedures or guidelines).
- Is outside the scope of an Individual's authority resulting in an unauthorized transaction.
- Could damage the company's reputation.
- Amounts to improper conduct.
- Sexual harassment or work place harassment and discrimination.
- Forced to resign under pressure.

2. Safeguard

Uga recognises that the decision to report a concern can be a difficult one to make, not least because of the fear of reprisal from those responsible for the malpractice. The Company will not tolerate harassment or victimisation and will take action to protect you when you raise a concern in good faith.

3. Confidentiality

Uga will do its best to protect your identity when you raise a concern and do not want your name to be disclosed. It must be understood that the investigation process may reveal the source of the information and a statement by you may be required as part of the evidence.

Uga strongly encourages you to put your name to your report. Uga is committed to protecting employees who make reports under this policy, so there should be no reason to report anonymously. In addition, subsequent investigation may be hindered if contact cannot be made with the individual raising the concern to obtain clarification or further information. The company is obliged and committed to respect the rights of all of its employees, which include the right for an accused person, in due course, to know the identity of his or her accuser. The identity would, however, not be disclosed unless it is absolutely necessary for the purpose of the investigation and/or subsequent action, and never disclosed without prior discussion with the employee making the report. In certain jurisdictions, the company may not be able to investigate matters which are disclosed anonymously.

Concerns expressed anonymously are much less effective, but they will be considered at the discretion of the management. In exercising the discretion, the factors to be taken into account would include;

1. Seriousness of the issues raised
2. Credibility of the concern
3. Likelihood of confirming the allegation from attributable sources.
4. Untrue Allegations

If you make a report under this policy in good faith, but it is not confirmed by subsequent investigation, no action will be taken against you. **If, however, you make allegations that are malicious, frivolous or simply to cause anger, irritation or distress, disciplinary action may be taken against you.**

4. How to raise a concern

As a first step, you should normally raise the concerns with either your line manager, your HR representative or the General Manager of your hotel or department. This depends, however, on the seriousness and sensitivity of the issues involved and who is thought to be involved in the malpractice. For example, if you believe that management is involved, you should approach the Director / CEO or the Group Head of HR.

Concerns are better raised in writing. You are invited to set out the background and history of the concern, giving names, dates and places where possible, and the reason why you are particularly concerned about the situation. You can write to the following **email** address or call to the CEO & GM-P&C.

wbp@ugaescapes.com

- Russel Clements – GM – People & Culture – 077 1539417
- Ramli Ghafoor – Director / CEO – 077 7744149

All emails to this address are received by the CEO's office and GM – People & Culture.

5. How Uga Escapes will respond

The action taken by the company will depend on the nature of the concern. The matters raised may:

1. Be investigated internally
2. Be referred to the external auditor
3. Form the subject of an independent Inquiry
4. Be referred to the Police and or other authorities

6. Protection and support for whistle-blowers

No member of staff who raises genuinely-held concerns in good faith under this procedure will be dismissed or subjected to any unwarranted disciplinary action and victimisation as a result of such action. Workers who victimise or retaliate against those who have raised concerns under this policy will be subject to disciplinary action.