

WHISTLE BLOWER POLICY & PROCEDURE (ALAMAYA/QMS/WB/POLICY & PRO)

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This policy covers Alamaya Consultancy Limited Mauritius and Alamaya Consultancy Limited Kenya.

MD Signature:



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INTRODUCTION

The Board of Alamaya is committed to maintaining the highest standards of honesty, openness and financial accountability. Personnel may be the first to know when someone is doing something illegal or improper in relation to the company. Alamaya takes all malpractice very seriously, whether it is committed by senior managers, staff, suppliers or contractors. This document sets out a procedure by which personnel can report any concerns.

What sort of activities should I report using this procedure?

It is impossible to give an exhaustive list of the activities that constitute misconduct or malpractice but, broadly speaking, these will be criminal offences or failures to comply with legal obligations. If personnel make a report in good faith then, even if it is not confirmed by an investigation, the concern will be valued and appreciated and the individual(s) will not be liable to disciplinary action. However if a false report is made, maliciously or for personal gain, then they may face disciplinary action.

EXAMPLES OF WHAT WARRANTS WHISTLEBLOWING AND WHAT DOES NOT	
✓	X
Fraudulent activity	Someone is late for work
Health & Safety Violation	Someone has not come to work
Theft	Someone is sick and not reported in as such

How do I make a report?

Personnel must make a report in writing specifying as much detail as possible. The Whistle Blower policy is managed by an independent company which reports to Alamaya. Contact details are below.

Contact Details for Whistleblowing (Anonymous):

Email: legal@alamaya.co

Will Alamaya protect my identity if I make a report?

Alamaya will do everything possible to keep reports anonymous, however, there may be circumstances (for example, if a report becomes the subject of a criminal investigation) wherein an individual(s) may be needed as a witness. Should this be the case Alamaya will discuss the matter with the individual(s) at the earliest opportunity.

ACTING IN GOOD FAITH

This Whistle Blower Policy is intended to encourage and enable directors, employees and all Alamaya stakeholders to raise serious concerns within the Company rather than seeking resolution outside the Corporation. Anyone filing a report must be acting in good faith and have reasonable grounds for filing a report. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

HANDLING OF REPORTED VIOLATIONS

The authorised company shall address all reported concerns or complaints, including those regarding operations, compliance, accounting standards and non-financial code of ethics violations. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation. In some circumstances, the use of a reputable advisor may be utilised to assist in the review and decision-making process.

RETENTION OF RECORDS

The Company shall retain records relating to any concern or report of a retaliatory act and to the investigation of any such report for a period judged to be appropriate based upon the merits of the submission. The types of records to be retained shall include records of all steps taken in connection with the investigation and the results of any such investigation.

REVIEW OF POLICY

The Alamaya Board will review and evaluate this Policy on an annual basis to determine whether the Policy is effective in providing appropriate procedures to report violations or complaints regarding operations, compliance, accounting standards and non-financial code of ethics violations.