



Issued by:	Group Risk and Compliance	Version:	1.0
	Kelix Bio Whistle Blowing Policy	Effective Date:	1 st Oct. 2021

	Name	Designation
Prepared by	Irfan Ahmed	Group Risk and Compliance Officer
Reviewed by	Hocine Sidi Said	Group Chief Executive Officer
Approved by	Jerome Silvestre	Chairman

DOCUMENT HISTORY			
Date	Revision #	Author	Change made / Reason for change
25 th Aug. 2021	1.0	Irfan Ahmed	New Policy

	Issued by:	Group Risk and Compliance	Version:	1.0
	Kelix Bio Whistle Blowing Policy		Effective Date:	1 st Oct. 2021

Table of Contents

1. Introduction	3
2. Purpose	3
3. Applicability and Scope	3
4. When should an employee speak up?	3
5. Anonymity	4
6. Protection	4
7. Reporting in good faith	4
8. Communication Channels	5
9. Information to be Provided	5
10. Disciplinary action	5
11. Confidentiality and Retention of Documents	6
12. Training & Sensitization	6
13. Review and update to Policy	6

1. Introduction

- 1.1. Kelix Bio Limited “KB” is committed to fostering an organisational culture of ethical behaviours and a harmonious and inclusive work environment, anchored in the values of commitment to excellence, integrity, responsibility, transparency and respect for people and the environment.
- 1.2. In order to achieve its objectives, KB and all its subsidiaries must have a strong compliance culture that embodies the values of the organization. With this in mind, an Employee Code of Conduct along with other integrity and ethics related policies was established to lay down the principles and standards that should govern the actions of KB, its board of directors, its employees, subsidiaries, and third-party service providers.

2. Purpose

- 2.1. This policy is intended to provide guidance on raising concerns about any actual or potential violation of the Code of Conduct, other policies and procedures of KB or any applicable laws and regulations, unprofessional or inappropriate conduct and on KB’s approach to addressing them appropriately. The management of KB encourages all employees who have any concern to seek advice from their line manager in the first instance or to contact their Ethics, Risk and Compliance Officer. In the event that these channels are not suitable, or the concerns may need further review or investigation, then the employees should raise their concerns under this policy.

3. Applicability and Scope

- 3.1. This Policy is applicable to board members, all employees (including temporary personnel), and all consultants, contractors, trainees, ex-employees, stakeholders, vendors and service providers or any other third party of KB or any of its subsidiaries. All board members, employees and third parties are obligated to report any actual or potential violation of Code of Conduct, policies and procedures of KB, any applicable laws and regulations or any other unprofessional and inappropriate conduct.
- 3.2. The policy is designed to deal with concerns raised in relation to issues that are in the interest of KB and may have adverse legal, reputational and/or financial impact on it. Only genuine concerns should be reported, although actual evidence of wrongdoing is not necessary.

4. When should an employee speak up?

- 4.1. This Policy encourages employees and third parties to raise concerns relating to matters, including, but not limited to:
 - a. Possible breaches of the Code of Conduct
 - b. Bribery and kickbacks
 - c. Financial issues and fraud
 - d. Misuse or misappropriation of assets of KB or its subsidiaries including its funds
 - e. Conflict of interest

- f. Anti-trust and Anti-competitive practices
- g. Insider trading
- h. Inappropriate sales, marketing and promotional practices
- i. Inappropriate employee relations, discrimination and other inappropriate behaviour
- j. Sexual harassment
- k. Data privacy violations
- l. Information security violations
- m. Safety, Health & Environment related issues- Danger to the health and safety of any individual
- n. Any other violations of KB code, policies and procedures

5. Anonymity

- 5.1. KB shall accommodate reports from individuals who wish to remain anonymous., wherever allowed by local laws. You are encouraged to identify yourself, as doing so can help resolve the situation, especially if there is a need to follow up for additional information. However, if total anonymity is requested, it is important to note that successful investigation and resolution of the matter may depend on the amount of information shared and ongoing interaction.

6. Protection

- 6.1. KB undertakes that no one who reports any concern or wrongdoing under this policy in good faith will be subjected to any form of retaliation for coming forward, regardless of whether or not the matter is ultimately substantiated.
- 6.2. In the event that a person believes that he or she is experiencing any form of retaliation (whether financially, career based or socially) by any person within KB as a result of reporting a concern or wrongdoing or in assisting management in any investigation under this policy, such person must inform the local Ethics, Risk and Compliance Officer or Group Risk and Compliance Director, as appropriate. They can also reach out to the Chief Executive Officer (CEO). Such party will take appropriate action to protect the relevant individuals from any reprisals.

7. Reporting in good faith

- 7.1. If the reportee makes an allegation in good faith, but it is not confirmed by investigation, no action will be taken against the employee. Reporting in 'good faith' means making a genuine attempt to provide honest, complete and accurate information, even if the allegation or information later proves to be unsubstantiated or mistaken. Disciplinary action may be taken against the employee, if the employee makes false allegations with malicious intent.

	Issued by:	Group Risk and Compliance	Version:	1.0
	Kelix Bio Whistle Blowing Policy		Effective Date:	1 st Oct. 2021

8. Communication Channels

- 8.1. We encourage all employees who have any concerns to seek advice from their line manager in the first instance or to contact their Ethics, Risk and Compliance Officer. In the event that these channels are not suitable, or the concerns may need further review or investigation, then the employee should communicate their concern to KB.whistleblowing@Kelixbio.com

9. Information to be Provided

- 9.1. Where possible, reportees should include the following information:
- a. An outline of the known or suspected wrongdoing.
 - b. Details, to the best of the whistle blower's knowledge, about when, where, and how it occurred.
 - c. The names of those suspected of being involved (both internally and externally).
 - d. A list of those who may have the relevant information or files.
 - e. Details of how the whistle-blower came to know about the suspected activities.
 - f. What, if any, breaches of internal controls, policy, procedures, or other requirements the whistle-blower believes took place.
 - g. The names of anyone who the whistle-blower has discussed or reported this concern to.
 - h. The whistle-blower's name and contact details. This will be kept confidential as far as is reasonably practicable.
 - i. The date and time of making the report.

10. Disciplinary action

- 10.1. The Group Risk and Compliance Director at his discretion, based on preliminary facts available may decide to address a reported concern either by investigating internally or through identified external third-party service providers.
- 10.2. The purpose of the investigation of the concern includes:
- a. To determine if the specific allegations of misconduct are substantiated by the available oral and documentary evidence.
 - b. To determine whether other misconduct may have occurred.
 - c. To identify areas of potential risks to KB as a result of the misconduct.
 - d. To identify areas of business operations that may require improvement as a result of misconduct.
- 10.3. The concern may be considered closed if there are no specific details provided by the whistle-blower/complainant and there was no response from the complainant for a reasonable period of time.
- 10.4. Based on findings supported by necessary evidences, appropriate recommendations will be finalized.

	Issued by:	Group Risk and Compliance	Version:	1.0
	Kelix Bio Whistle Blowing Policy		Effective Date:	1 st Oct. 2021

10.5. Person against whom the concern is raised shall be provided with a reasonable opportunity of being heard, before taking any disciplinary action in this regard.

10.6. No one shall create, withhold, tamper or destroy any evidence or other document related to the concern and should not interfere in the fair proceedings of the investigation.

11. Confidentiality and Retention of Documents

11.1. All documents received from the Complainant and evidence obtained during the investigation and the report shall be maintained in strict confidentiality and retained in accordance with applicable laws unless, disclosure is mandated by a court order or is otherwise necessary to comply with the requirements of applicable laws.

12. Training & Sensitization

12.1. Appropriate training and sensitization on the policy to be provided to all the employees on the policy.

13. Review and update to Policy

13.1. This Policy should be reviewed at least bi-annually and additionally if external circumstances such as changes to the local laws so require. The amendment is delegated to the Chair of the Audit and Risk Committee, who in consultation with management will report such amendments to policy to the Board.