

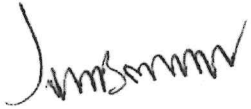
# CASE MEDINSURANCE



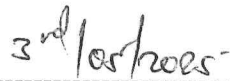
## WHISTLEBLOWING POLICY

APPROVAL

This Whistleblowing Policy was approved by the Board of Directors



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Director



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Date.

## 1. INTRODUCTION

From time to time, a member of staff might discover information which he or she believes constitutes wrongdoing or malpractice within the organisation. This policy aims to:

- 1.1 Create an avenue for such information to be disclosed without fear of reprisal to appropriate persons within the organisation;
- 1.2 Provide various channels for reporting actual or suspected wrong-doings committed by any staff, supplier, service provider, contractor or other stakeholders dealing with the Company for investigation and appropriate action;
- 1.3 Provide assurance that the staff making the report (**"Whistle-blower"**) will be protected from reprisals, retaliation or any adverse treatment. For the purposes of this Policy, a Whistle-blower is defined as a person who raises an alert on an unlawful or immoral activity.

## 2. POLICY STATEMENT

CASE MEDINSURANCE is committed to the highest standards of honesty, openness and accountability. It aims to ensure that it operates in a responsible manner, taking into account ethical business standards set out by the Board of Directors. It recognises that individual members of staff have an important role in helping to achieve this aim.

It is often members of staff who are first to know if someone in the Company or connected with it is acting improperly. It is normal for such employees to feel apprehensive or anxious about raising their concerns and their loyalty to, or fear of a colleague may prevent them from doing so. They might also be concerned that they will not be taken seriously, may be branded a "trouble maker" or a "snitch" or that adverse action may be taken against them especially if the subject of the report is a senior employee.

CASE MEDINSURANCE encourages staff and individuals who have knowledge, or reasonable suspicion of wrongdoing to come forward and report the same. The Company takes all wrongdoing seriously and believes that any report on any unlawful acts, acts of misconduct or impropriety should be investigated thoroughly. Individuals are encouraged and expected to, in the first instance, raise concerns internally through the provided mechanisms.

The purpose of this Policy is therefore to assist and enable staff members to raise concerns or to disclose information which they believe, in good faith, may indicate malpractice.


### 3. SCOPE OF THE POLICY AND PROCEDURE

This Policy extends protection to any Whistle-blower who may be an employee, service provider, supplier, contractor or intermediary. The policy and procedures are concerned with alleged malpractice, impropriety or wrongdoing might include one or more of the below actions:

- i. Financial malpractice or impropriety;
- ii. Conflict of Interest situations;
- iii. Fraud;
- iv. Improper conduct or unethical behaviour including any offence under the Anti-Corruption Act, 2009;
- v. Failure to comply with a legal obligation;
- vi. Failure to comply with the Code of Conduct and any rules and regulations that may be prescribed by the Company from time to time;
- vii. Suspected criminal activity;
- viii. Attempts to conceal any of the above.

The above list is by no means exhaustive and only indicative of what might constitute improper conduct.

#### **PROCEDURE FOR MAKING AND INVESTIGATING A DISCLOSURE**

The Company encourages employees and external stakeholders to report any of the above acts. Any staff wishing to make a report may disclose their identity or make reports anonymously. All reports will be treated with utmost confidentiality and will be acted upon.

Concerns may be raised verbally, by email, website or toll-free line. As it is essential for the Company to have all critical information in order to enable them effectively evaluate and investigate a complaint, the report made should provide as much detail and be as specific as possible.

The complaint/report should include:

- i. The misconduct the Whistle-blower wishes to report on;
- ii. Details of the parties concerned;
- iii. When (dates/time) and where (Company/department) the activities took place;
- iv. Proof (evidence substantiating the misconduct, where available);
- v. Motives (do they know or have an idea of why the action was committed);
- vi. Contact details (only if the person reporting so chooses) in case further information is required.


The Reports can be made to any of the following persons:

1. **The GENERAL MANAGER - [skorukundo@casemedservices.org](mailto:skorukundo@casemedservices.org)**
2. **Tip-offs Anonymous - [casecompliance@casemedservices.org](mailto:casecompliance@casemedservices.org)**. This is hotline service enables employees and other stakeholders to report workplace dishonesty while remaining totally anonymous. Reports are made to an independent reporting center via multiple reporting channels including telephone (toll-free or call back facility), email and web which are then notified to the Company for investigation. The notification is made to the Board Audit & Compliance Committee which gives direction on the investigations.

Complaints raised to other parties within the Company should be directed to any of the above persons for the purpose of maintaining a centralized repository of all reported cases and ensuring that issues raised are properly followed-up investigated and addressed.

All matters reported will be reviewed within a reasonable timeframe and after due consideration and inquiry, a decision will be taken on appropriate action to be taken. All reports and actions taken will be reported to the Board Audit and Compliance Committee on a quarterly basis.

#### **4. SAFEGUARDS**

In keeping with applicable law, the Company prohibits discrimination, retaliation or harassment of any kind against a Whistle-blower who submits a complaint or report in good faith. This is done through the following measures.

##### **4.2. Confidentiality**

The identity of the individual making an allegation will remain confidential, unless otherwise agreed with that individual.

##### **4.3 Protection**

The Policy offers protection against dismissal or other punitive action to those individuals who make reports in accordance to this Policy.

#### **5. UNSUBSTANTIATED ALLEGATIONS**

No action will be taken against an individual who makes an allegation in good faith even if it is not confirmed by subsequent investigations. If, however, an individual makes what are subsequently determined to be malicious or vexatious allegations or made for personal gain, and particularly, if he or she persists in making them, appropriate action may be taken.

## **6. HANDLING OF REPORTS**

All reports made will be investigated and handled by designated officers of the Company as each specific case may require. The Company may in appropriate cases, particularly if the report pertains to criminal activity forward such report to external bodies like the police, Insurance Fraud, CID etc.

## **7. COOPERATION**

An employee who fails to cooperate in an investigation, or who deliberately provides false information or withholds information during an investigation, shall be subject to disciplinary action up to, and including, dismissal.

If, at the conclusion of an investigation, the Company determines that a violation has occurred or the allegations are substantiated, effective remedial action commensurate with the severity of the offence will be taken.

## **8. FAIR HEARING**

Any person named in a report will be given an opportunity to be heard and defend themselves before any action is taken.

## **9. INDEPENDENT ADVICE**

Any clarification on this Policy or procedure for whistle blowing, may be obtained from any of the following persons;

- i. The CEO;
- ii. The Company Secretary;
- iii. The Head of Human Resources.

## **10. MODIFICATION**

This Policy may be modified from time to time as advised to the employees.
