

Fraud Prevention Policy

We will ensure a culture is instilled where Fraud is not tolerated and is pro-actively discouraged and the risk of Fraud to the company is minimized and any Fraud or suspected Fraud is promptly reported and effectively investigated.

Objective

Whistl recognises the need to have Fraud prevention policies, procedures and reporting mechanisms to protect our business and the integrity of our financial reporting, to comply with all applicable laws and regulations in the countries it operates. The primary objectives of this policy is to ensure:

Fraud or suspected Fraud is promptly reported and effectively investigated.

Losses caused by Fraud are prevented or recovered.

Consistent and effective action is taken against those persons proven to have committed Fraud.

No employee or organisation is charged with Fraud until and unless conclusive evidence of such wrongdoing has been established through a robust investigative process.

We will achieve this by:

- 1.1. Ensuring Whistl is supported by an effective internal audit structure which is designed to prevent Fraud
- 1.2. Ensuring reporting mechanisms exist whereby employees can report Fraud without fear of reprisal and can do so with the knowledge that all reports of Fraud will be robustly investigated

In particular we will:

- 2.1. Monitor the Whistleblowers line so employees can report and Fraud or suspected acts of Fraud
- 2.2. Ensure Whistl has a robust internal audit programme to mitigate against Fraud
- 2.3 As a general rule and in accordance with applicable laws, we will initiate criminal prosecution of and/or civil action against the persons that committed Fraud