

Rev: 01

Date: 22<sup>nd</sup> April, 2023

## WHISTLE BLOWING POLICY

Whistle blowing is an important tool for promoting transparency and accountability in organizations. It enables employees to report any wrongdoing or illegal activity they observe within their workplace without fear of retaliation. In the maritime industry, it is essential to have a robust whistleblowing policy to ensure the safety and well-being of employees, customers, and stakeholders. This policy will outline the steps that employees should take when reporting any suspected misconduct or illegal activities.

### Policy:

**Purpose:** The purpose of this policy is to establish a mechanism for employees and Interested Parties to report any illegal or unethical conduct within **Greenswift Investment Nigeria Limited**, without fear of retaliation.

**Scope:** This policy applies to all employees, contractors, vendors, and stakeholders Associated with **Greenswift Investment Nigeria Limited**.

### Reporting Mechanisms:

The company provides the following mechanisms for reporting suspected illegal or unethical conduct that includes, but not limited to:

- Any illegal act
- Any Human Rights Violation
- Gross Misconduct against company code of conduct
- Violation of company policies and procedures
- Non-conformity to statutory requirements
- Breach of the ANTI-BRIBERY AND CORRUPTION policy
- Health and Safety Breach

Process for reporting should be by.

- a. Direct reporting to the CM
- b. Reporting to a designated whistleblowing officer or compliance officer
- c. Reporting to an appropriate Authority (ICOCA, FIRS, Health Authority)
- d. Reporting to the company email address: [ggt@greenswift.com](mailto:ggt@greenswift.com) ( Subject Title: WHISTLEBLOWING)

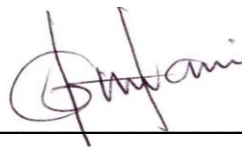
**Confidentiality:** The company will treat all whistleblowing reports with the utmost confidentiality and will take all reasonable steps to protect the identity of the whistleblower.

**Protection against Retaliation:** The company prohibits any form of retaliation against whistleblowers who report suspected illegal or unethical conduct in good faith. Any employee found to be engaging in retaliation against a whistleblower will be subject to disciplinary action, up to and including termination.

**Investigation and Follow-up:** The CM will promptly investigate all reports of suspected illegal or unethical conduct and take appropriate corrective action. The whistleblower will be informed of the outcome of the investigation to the extent permitted by law. Those implicated in the report are to be advised of the allegations made against them and be given the opportunity to explain/refute them. Disciplinary action will be taken against violators of this illegal or unethical conduct.

**False Reports:** The company will not tolerate the filing of false reports or malicious allegations. Any employee found to be filing false reports or making malicious allegations will be subject to disciplinary action, up to and including termination.

**Communication and Training:** The company will communicate this policy to all employees, contractors, vendors, and stakeholders and will provide regular training on the importance of whistleblowing and the procedures for reporting suspected illegal or unethical conduct.



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**Tari Best**  
**CHAIRMAN/CEO**

