

## Caravan Group of Companies

POLICY NAME	WHISTLEBLOWER POLICY				
EFFECTIVE DATE	October 2024	DATE OF LAST REVIEW	-	POLICY/ VERSION NO.	CGC-EHS-POL-08-01
DIVISION/GROUP	All Divisions		DEVELOPED BY	Executives	

### STATEMENT

Caravan Group of Companies ("Caravan") is committed to honesty, integrity, and upholding the highest ethical standards of business conduct. All employees, contractors and stakeholders are expected to maintain the highest standards of ethics and compliance with laws and regulations in all their business interactions.

We encourage all employees, contractors, and stakeholders to speak up and report any concerns related to misconduct, unethical practices, or violations of our Code of conduct, company policies and legal requirements. This is to ensure our commitment to integrity, transparency, and accountability.

### SCOPE

This policy applies to all employees, contractors, vendors, and stakeholders of Caravan. It covers any suspected wrongful conduct including but not limited to:

- Fraud or financial irregularities
- Violations of laws, regulations, or company policies
- Health, safety, and environmental concerns
- Theft, corruption or bribery
- Harassment or discrimination
- Suspicious behaviour

### POLICY

#### Commitment

The Company is committed to ensure any concerns raised regarding any misconduct or improper state of affairs or circumstances in relation to Caravan's business are dealt with effectively, securely, and appropriately. The Company encourages the reporting of suspected unethical, illegal, corrupt, fraudulent or undesirable conduct involving the Company's business. We assure protections and measures to individuals who make a disclosure in good faith, in relation to such conduct without fear of victimization or reprisal.

### **Reporting Mechanisms**

Caravan encourages employees, contractors and stakeholders to report any concerns or reasonable suspicions regarding unethical or illegal practices. Reports can be made confidentially through the company website, [www.caravangroup.com](http://www.caravangroup.com) by navigating to the forms tab and selecting "Confidential Report".

### **Confidentiality and Data Protection**

All reports will be maintained in the strictest of confidence. By submitting the Whistleblower report you consent to the collection of personal data to examine the information reported, investigate the allegations, uphold and enforce legal obligations, legislative and regulatory bodies. All personal data shall be handled in accordance with applicable privacy laws and regulations. The Company shall assure the protection of the identity of an individual who reports concerns. A person's identity will only be disclosed if consent by the individual has been provided to disclose such information, or where disclosure is required by applicable law.

### **Protection Against Retaliation**

The company is committed to ensuring that whistleblowers are protected from retaliation, including termination, suspension, harassment, or discrimination. Any form of retaliation will result in disciplinary action, which may include termination of employment.

### **Investigation**

The Company will investigate all matters reported under this policy as soon as practicable after the matter has been reported. All investigations will be conducted in a fair, independent and timely manner and all reasonable efforts will be made to preserve confidentiality during the investigation. Reports will be submitted to the Executive team comprising of the CEO, CFO, and COO. Depending on the submission, the Executive Team will delegate or complete the investigation themselves.

The individual who reports a concern will be contacted by their preferred method of communication to discuss the investigation process and any other matters that are relevant to the investigation. Where an individual has not provided consent, their identity will not be disclosed to the investigator or to any other person and the Company will conduct the investigation based on the information provided to it.

Where possible, feedback will be provided on the progress and expected timeframes of the investigation. The person against whom any allegations have been made will also be informed of the concerns and will be provided with an opportunity to respond (unless there are any restrictions or other reasonable bases for not doing so).

To the extent permitted by law, the persons reporting the concern and/or person against whom allegations have been made may be made aware of the findings. The Company will document the findings in a report however any report will remain the property of the Company and will only be shared to those involved in the reported concerns, if the Company deems it appropriate.

The findings and any recommended corrective actions will be reviewed by the Executive and, if necessary, by the Board of Directors. All reports, investigations, and related documents will be kept and stored with restricted access. Access will be limited to the Executive team.

## RESPONSIBILITIES

### Whistleblower (Employee/ Contractor/ Stakeholder)

- Report any observed unethical or illegal activities in good faith, following the procedures outlined in this policy.
- Provide truthful and accurate information when submitting a report.
- Cooperate fully with any follow-up investigation, if necessary.

### Human Resources

- Promote awareness of the whistleblower policy among employees and contractors.
- Assist in the administration of training and communications related to ethical reporting and whistleblower protections.
- Ensure that whistleblowers are protected from retaliation

### Managers and Supervisors

- Encourage an open environment where employees feel safe reporting concerns.
- Report any whistleblowing incidents immediately.
- Ensure that any reports are treated seriously and that confidentiality is maintained.

### Executives/ Board of Directors

- Ensure the necessary resources are allocated to support the whistleblower protection process.
- Conduct, Review and address the findings of any investigations conducted.
- Ensure that any systemic issues highlighted by whistleblower reports are corrected to improve company practices.

## APPROVAL AND REVIEW

This policy has been approved by the corporate management team and has the authorization to be effective at the above mentioned date with regular review and updates on a yearly basis. This policy does not supersede any regulatory legislation and should not be taken as an interpretation of any legislation or provide legal advice on such matters. Should this policy conflict with any legislation it will automatically be revised to be in compliance with those such updates.

## REVISION HISTORY

- N/A