

WHISTLE BLOWING POLICY

<p>1.0 PURPOSE</p>	<p>This policy framework is intended to encourage staff of BOFF & Co and all stakeholders to report unethical or illegal conduct or conduct of employees, management, directors, and other stakeholders to appropriate authorities. This will be done with utmost discretion and confidentiality, without any fear of harassment, intimidation, victimization or reprisal of anyone for raising a concern.</p>
<p>2.0 POLICY STATEMENT</p>	<p>The Company is committed to maintaining an open working environment in which staff can report instance of unethical, unlawful or undesirable conduct without fear of intimidation or retaliation and same managed in a timely and appropriate manner.</p> <p>Any affected Person (director, employee, financial advisor, customers/vendors) who, in good faith, has observed reportable misconduct and makes a disclosure pursuant to this Policy with respect to a harmful violation or potential harmful violation is referred to as a "Whistle Blower" and is protected from any retaliation or reprisal by the company or any employee of the company. The disclosure contemplated herein should be true and reasonable.</p> <p>"Good faith" in this case, means that the employee has a reasonably held belief that the disclosure made is true and has not been made either for personal gain or for any ulterior motive.</p> <p>This Policy and the related procedures offer protection from retaliation or reprisal to a Whistle Blower, who makes any disclosure with respect to matters that could give rise to, harmful violations in the organization, provided the disclosure is made in good faith. All stakeholders should ensure that appropriate steps are taken to disclose any wrongdoing or malpractice of which they become aware as non-action/ concealment will be deemed as complicity.</p> <p>Suggested reporting lines are contained within this Policy and all matters shall be dealt with in a timely manner, with sensitivity and by the appropriate persons.</p>
<p>3.0 SCOPE</p>	<p>This Policy is designed to enable staff, partners, customers and other stakeholders report acts of impropriety to appropriate authorities. The report should however not be based on mere speculation, rumours, malice or gossip but on personal knowledge of verifiable facts or circumstances to indicate that the reportable misconduct has occurred or likely to occur.</p> <p>All stakeholders are protected from victimisation, harassment or disciplinary action as a result of any disclosure, where the disclosure is made in good faith and is not made maliciously or for personal gain. Reportable misconduct include without limitation to the following:</p> <ul style="list-style-type: none"> • All forms of financial malpractices or impropriety such as fraud, corruption, bribery or theft; • Actions detrimental to Health and Safety or the Environment; • Any form of criminal activity;

	<ul style="list-style-type: none"> • Improper conduct or unethical behaviour; that undermines universal and core ethical values such as integrity, respect, honesty, accountability, fairness etc; • Failure to comply with regulatory directives, administrative or internal policy framework; • Failure to comply with legal obligations or statutes. • Other forms of corporate governance breaches; connected transactions; insider abuse; non-disclosure of interest; • Sexual or physical abuse of any staff, financial advisor, clients, service provider, vendor and other relevant stakeholders; • Conduct translating to gross waste of resources; • Attempt to conceal any of the above listed acts. <p>This Policy impacts all stakeholders of the Company, regardless of grade, location or function.</p>
<p>4.0 MEDIUM, PROCEDURE AND CONTROL</p>	<p>This procedure provides a method for reporting any unlawful conduct and guarantee that any disclosure would not pose risks to the Whistle Blower.</p> <p>The Whistle Blower should however make it clear that they are making their disclosure within the scope of the Whistle-blowing Policy.</p> <p>We have two categories of whistle blowers, namely, Internal and external.</p> <p>Internal Whistle Blowers include staff who are expected to report incidents of misconduct involving peer, supervisor/superior or top Management staff</p> <p>External Whistle Blowers Include clients, vendors, service providers and other members of the public who would want to report wrong doings of employees to relevant authorities.</p> <p>An Internal/External Whistle Blower may raise concerns through any of the following:</p> <ul style="list-style-type: none"> • Dedicated phone number • Dedicated email • Electronically log on to www.boffbrokers.com and click on the whistleblowing portal to report the misconduct. <p>A committee has been setup to investigate all reports received from any of these designated channels and ensure that they conduct investigation within the ambit of the Policy and more importantly, protect the identity of the Whistle Blower.</p> <p>The committee comprises of the Chairman, MD/CEO, Executive Director, Finance & Administration, Financial controller, Head IT and Head Human</p>

	<p>Resources and Administration.</p> <p>Note: This medium shall be checked on a fourth night basis by the person(s) in charge.</p> <p>BOFF & Co shall investigate thoroughly any actual or suspected breach areas of concern and the same shall be concluded within the time frame approved by the Board and Management and communicated appropriately.</p>
5.0 PROTECTION FOR WHISTLE BLOWER	<p>BOFF & Co has an obligation to adequately protect the Whistle Blower.</p> <p>Reprisal against any staff who in good faith reports a concern about illegal or unethical conduct will not be tolerated.</p> <p>The Company is also committed to maintaining confidentiality and provides assurance that all reports will be subject to appropriate investigation and a logical conclusion.</p>
6.0 SANCTION	<p>Employees found to be in breach of our Company policy shall be subjected to disciplinary action as stated and approved by the Board and Management.</p>
7.0 AFFIRMATION PROCESS	<p>All employees shall acknowledge that they have read, understood, and will comply with the Policy to support the Company's Whistle Blowing Policy and Procedure Manual.</p>