

WHISTLEBLOWING POLICY (The “Policy”)

PROPRIETARY NOTICE

The information contained in this document is proprietary to the

Eagle Insurance Ltd
(Hereinafter referred to as the “EIL”).

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Table of Contents

1 GLOSSARY OF TERMS 3

2 INTRODUCTION 3

2.1 What Types Of Concerns Are Covered By Our Whistleblowing Policy?..... 4

3 WHISTLEBLOWING MECHANISM 5

3.1 How To Raise A Concern Regarding An Employee Or Stakeholder 5

3.2 How Should An External Stakeholder Raise A Concern? 5

3.3 How To Raise Concern Regarding The CEO And/Or Human Capital Manager And/Or A Direct 6

3.4 Internal Investigation 6

3.5 Roles And Responsibilities 6

3.5.1 The Chief Executive Officer 6

3.5.2 Managers 6

3.5.3 Employees 7

3.5.4. The Investigation Team 7

3.5.5. The Risk Officer 7

3.6 Outcome Of Investigations 8

3.6.1 Protection For Whistleblowers 8

4 CONFIDENTIALITY 8

5 RECORDKEEPING 8

6 OPERATIONAL REPORTING TO THE DPO 9

7 AVAILABILITY OF POLICY 9

8 CONSEQUENCES OF NON-ADHERENCE 9

9 POLICY REVISION 9

10 POLICY CONTROL 9

SCHEDULE 1 – WHAT IS NOT COVERED UNDER THE WHISTLEBLOWING POLICY? 10

1 GLOSSARY OF TERMS

In this document, any reference to:

- “you” or “your” or the “employee or stakeholder” shall mean the “whistleblower”;
- As per sub-part III of the Financial Crimes Commission 2023, “**fraud**” involves **intentionally deceiving others to gain something for yourself or someone else, or to cause harm or loss to someone**
- “Whistle Blowing” - Transparency International defines whistle blowing as the disclosure of information about a perceived wrongdoing in an organization, or the risk thereof, to individuals or entities believed to be able to effect action. Whistleblowing encourages and enables stakeholders including employees to safely raise serious concerns within EIL or through external channels approved by EIL (e.g. Regulators).

2 INTRODUCTION

The Board of Directors of EIL (the “Board”) is committed to the highest possible standards of openness, integrity, and accountability.

The Board has therefore put in place this Whistleblowing Policy (“the Policy”) to assist any stakeholders, but particularly employees, who believe and suspect in good faith that they have come across or discovered malpractices, abuses, misconducts, misuses or improprieties within EIL.

The Policy therefore aims at providing an avenue and a credible mechanism for stakeholders and employees to raise concerns about malpractices happening at EIL which may be detrimental to EIL, its employees, or stakeholders, including clients.

In that context, EIL encourages any stakeholder, and in particular its employees, to blow the whistle at any one time as may be necessary and without any fear of victimization or reprisal.

It is recommended that this Policy be read in conjunction with EIL’s Code of Ethics.

2.1 What types of concerns are covered by our Whistleblowing Policy?

Issues that are reportable under this Policy include any of the following acts that might have been committed or are likely to be committed and which has a direct impact on the organization:

- any suspected or deliberate conduct that constitutes (i) a criminal offense including bribery, corruption, fraud, or misuse of office; (ii) breaches applicable laws or (iii) fails to comply with legal and regulatory obligations
- any health and safety risks including risks to the public as well as to other employees;
- damage to the environment;
- any sexual, physical, moral or other abuse (e.g. verbal abuse, bullying or harassment) of employees/ clients or any stakeholder;
- any actions which are deemed unprofessional or inappropriate or which may conflict with a general understanding of what is right or wrong;
- any unethical conduct in breach of EIL's Code of Ethics;
- any abuse of power, authority, or discriminatory conduct;
- any unethical sales practices related to office materials;
- any conflict-of-interest issue that may influence claims decisions and policy approval to benefit personal connections;
- any cases where employees are knowingly approving fraudulent insurance claims to benefit specific clients or external parties;
- insider trading (i.e., misuse of confidential information for personal financial gain);
- anti-competition practices (e.g., price fixing, market sharing, or abuse of market dominance);
- breach of data privacy (e.g., unauthorized access, disclosure, or misuse of personal or confidential information);
- financial malpractice (e.g., manipulation of financial statements, false accounting, or improper financial reporting);
- criminal activity (e.g., theft, or any act in breach of criminal law impacting the organization); and
- any action aiming at concealing any of the above activities.

3 WHISTLEBLOWING MECHANISM

3.1 How to raise a concern regarding an employee or stakeholder

As a first step, the employee should normally raise concerns with his/ her immediate supervisor, functional head, manager or reporting line.

This may depend, however, on the seriousness and severity of the issues involved and who is suspected of the malpractice. For example, if you believe that your immediate management is involved, you should approach a more senior level of management.

In case the employee is not comfortable to report the matter to his/ her immediate supervisor, functional head, manager/ reporting line or Senior Management, he/ she can report his/ her concern/ s by letter, e-mail, telephone, in person or anonymously (if so desired) to one or more of the persons listed in the table below.

Name	Position	Phone Number	Email
Sattar Jakaria	EIL CEO	460 9298	sjakaria@eagle.mu
Parama Mootooveeren	Human Capital Manager	460 9243	pmootooveeren@eagle.mu
Kevin Lennon	Group Human Capital Operations Manager of IBL	203 2000	KLennon@iblgrou.com

3.2 How should an external stakeholder raise a concern?

External stakeholders should contact the Chairperson of the Corporate Governance Committee should they wish to raise a whistleblowing matter. The Chairperson of the Corporate Governance Committee shall then be a conduit to the investigation team.

The matter should be addressed to the Chairperson of the Corporate Governance Committee at the following registered address: IBL House Caudan Waterfront, Port Louis, Mauritius.

3.3 How to raise concern regarding the CEO and/or Human Capital Manager and/or a Director

In case the employee wishes to report a matter about the CEO, the Human Capital Manager, or any Director, he/ she can report his/ her concern/s by letter, e-mail, telephone, in person or anonymously (if so desired) to Mr Kevin Lennon, Group Human Capital Operations Manager of IBL.

3.4 Internal investigation

The concern that is being reported under 3.1 or 3.2 needs to be well structured and contain all relevant information including all evidence as far as possible.

For the sake of obtaining information, employees should take care not to use 'illegal' or unethical ways to obtain any form of evidence that may compromise the outcome of any subsequent investigation.

The person(s) to whom the concern has been reported (collectively referred to as the Investigation team or Whistleblowing Champions) shall carry out an internal investigation into the alleged grievance. Any member of the investigating team shall maintain in strict confidentiality the concern being reported and the name (if available) of the whistleblower. This duty of confidentiality will be lifted only in cases of mandatory disclosure or reporting to legal or regulatory authorities.

3.5 Roles and Responsibilities

3.5.1 The Chief Executive Officer

The CEO is responsible for ensuring that:

- Reported concerns are responded and consistent with this Policy and other procedures.
- Employees are protected against retaliation when reporting concerns in good faith.
- Local management is trained on this Policy. Every manager must be informed of their obligation to forward any report of actual or suspected illegal, fraudulent, or improper conduct they receive to the reporting channels outlined above.

3.5.2 Managers

Managers are responsible for:

- Knowing and complying with the requirements and spirit of this Policy.
- Acknowledging training and awareness materials regarding this Policy.
- Raising issues and concerns when they arise.
- Cooperating with internal investigations.
- Ensuring that no retaliatory measures are taken in response to reports of concerns made in good faith.

3.5.3 Employees

Employees are responsible for:

- Knowing and complying with the requirements and spirit of this Policy.
- Immediately reporting any fraudulent or unethical conduct that is in breach of this Policy or EIL's Code of Ethics.
- Ensuring that concerns being reported under this Policy are true and made in utmost good faith and integrity.
- Not seeking personal gain and/or any sort of revenge as a result of reporting a concern.
- Acknowledging training and awareness materials regarding this Policy.
- Cooperating with internal investigations.

3.5.4. The Investigation team

- To gather evidence, interview involved parties, document findings and ensure that all relevant information is considered.
- Maintain a whistleblower log.
- Ensures that the investigation complies with company policies, legal requirements, and regulatory standards.
- Recommend the necessary remedial actions to address the concern that has been reported.
- The Human Capital representative to provide insights into employee policies, rights, guidelines and advise on potential disciplinary actions if necessary.
- The Human Capital representative to make sure that all related documentation is properly stored ensuring strict confidentiality is maintained at all times.

3.5.5. The Risk Officer

- To report to the Board issues of concern reported by whistleblowers and the outcomes of matters investigated on a yearly basis.
- To report to the Board the corrective actions taken by management as a result of concern received from a whistleblower.
- To review this Policy in consultation with the Human Capital Manager on a regular basis to ensure that it is compliant to any laws and regulations as well as to ensure its relevance and effectiveness.

3.6 Outcome of investigations

Investigations into concerns received under section 3.1 & 3.2 of this Policy shall be completed within a reasonable period from the date of receipt of the concern. The investigating team overseeing the concern will also work closely with the Compliance department, the Information Systems department, the Human Capital department, the Risk department, and such other concerned departments and/ or other senior members of the management to ascertain corrective actions are taken pursuant to its findings and recommendations made.

The investigation team reserves the right to report the matter to the relevant authorities.

3.6.1 Protection for whistleblowers

Following the outcome of the investigation, it is important to note the following:

- No disciplinary action will be taken against an employee who makes an inaccurate disclosure as the result of an honest error.
- No action will be taken against an accused person if an allegation is shown to be unfounded.
- Whistleblowers found responsible for knowingly making false or malicious allegations may be subject to disciplinary action.

4 CONFIDENTIALITY

EIL will treat all disclosures in a confidential and sensitive manner. As part of this, the identity of the whistleblower (if known) will be always kept confidential by the investigation team and will only be disclosed, if necessary, with his/ her consent.

Whistleblowers (including external parties) are also expressly prohibited to disclose any details related to the matter raised, any details of whistleblowing reports or any other related information to the press, media, or any external parties

5 RECORDKEEPING

Information pertaining to concerns raised under this Policy will be retained for a period of seven

(7) years from the date of report.

The Human Capital Manager will be responsible for maintaining records and managing the repository for all whistleblowing cases unless the concern is against his/ her own person, the CEO or any Director of Eagle Insurance Limited.

The Group Human Capital Operations Manager of IBL will keep records of all concerns raised about the CEO, the Human Capital Manager or any Director of Eagle Insurance Limited.

Any confidential record on the steps taken shall always be kept in accordance with the Data Protection Act 2017.

6 OPERATIONAL REPORTING TO THE DPO

Operational data breach notifications shall be reported to the DPO in accordance with the established internal procedures.

The investigation team reserves the right to report the matter to the relevant authorities.

7 AVAILABILITY OF POLICY

This Policy can be found on EIL's Sharepoint and on EIL's website.

8 CONSEQUENCES OF NON-ADHERENCE

Breaches of this policy or any other policy are serious. Employees who do not conform to this Policy and associated policies may be subject to disciplinary action in terms of the applicable disciplinary processes and procedures.

9 POLICY REVISION

This policy will be reviewed every three (3) years from the effective date, or more frequent if required.

10 POLICY CONTROL

Title: Whistleblowing policy

Version Number: 1.0

Effective Date: 01 August 2025

Last Review Date: 21 July 2025

Policy Owner: Head of Risk

Date Approved: 29 July 2025

Location: EIL SharePoint and EIL website

SCHEDULE 1 – WHAT IS NOT COVERED UNDER THE WHISTLEBLOWING POLICY?

The Whistleblowing policy is designed to ensure that stakeholders including employees can raise their concerns about wrongdoing or malpractice within the company without fear of victimisation, subsequent discrimination, disadvantage, or dismissal. However, the policy is not a tool that encourages telling tales or spreading office gossip. You will find below a non-exhaustive list of cases not covered by the policy.

Examples of cases NOT covered by the policy:

- Complaints from employees about colleagues taking long breaks (operational issues are to be tackled at departmental levels);
- Disagreements over individual work assignments;
- Concerns about personal performance appraisals;
- Conflicts or poor relationships with colleagues, supervisors, and managers;
- Complaints about management style or communication preferences;
- Perceived unfair distribution of workload;
- Allegations of romantic relationships between colleagues
- Complaints about a supervisor/ manager being too strict

Note: Whether one should blow the whistle on an office romance depends on whether the relationship could infringe one of these guidelines already listed in company policies including, but not limited to the whistleblowing policy. Allegations about relationships (i) where no independence/ conflict of interest issue is posed; or (ii) where the parties involved do not have a boss-subordinate relationship do not make a report justifiable.