

MAURITIUS OIL REFINERIES LTD

WHISTLEBLOWING POLICY

1. OBJECTIVE

1.1 The aim of this policy is to encourage all employees to report or voice out their concern, in a responsible manner and without fear of retaliation, on any wrongdoing or malpractices that they may witness and/or they believe they have discovered during their professional activities. It also aims at protecting whistleblowers and discouraging malicious and/or abusive reports.

2. DEFINITION

2.1 Whistleblowing is the action someone takes to report wrongdoing at work that affects others. The person making such report being a “whistleblower”.

3. SCOPE

3.1 This policy applies to all employees of the company.

3.2 Issues that are reportable and may be investigated under this policy include:

- Any suspected offence in breach of government regulations/laws;
- Any suspected criminal offence including but not limited to bribery, corruption, fraud or misuse of office;
- Any action which can be detrimental to MOROIL and/or its stakeholders and/or its employees; and
- Any action which is against Moroil’s Code of Ethics and company policies.

4. SAFEGUARDS

4.1 The policy protects responsible whistleblowers from victimisation or negative reaction and discourages malicious or abusive reports to prevent unjustified reputational damage. Those concerned by a whistleblower's report will fully enjoy the presumption of innocence, a fair hearing and the right of defence.

4.2 Any employee who has been found to victimise or harass an employee who has raised a concern will face disciplinary action, which can include dismissal.

Likewise, anyone who has been reported by a whistleblower should not be exposed to victimisation or harassment.

4.3 This policy should not be used for an employee's own personal complaints about how they have been treated at work. In such cases employees should follow the appropriate company procedure to lodge a complaint.

4.4 All concerns will be treated in strict confidentiality.

4.5 The policy encourages employees to disclose their name without fear. Concerns expressed anonymously may be considered at the discretion of management. In exercising this discretion, the following factors will be taken into account:

- the seriousness of the issue raised;
- the credibility of the concern; and
- the likelihood of confirming the allegation from other sources

4.6 There will be no adverse consequences for any employee who reports a concern in good faith. If a concern is made in the public interest and there is reasonable belief in the truth of the allegation, there will be no recrimination against the individual raising the concern, even if the allegation is not confirmed by further investigation. However, any employee making allegations frivolously, maliciously, by grudge or annoyance, for personal gain or in bad faith may be subject to disciplinary action.

5. REPORTING AND DOCUMENT RETENTION

5.1 There will be regular reporting by the investigator to the Chairperson of the Corporate Governance, Remuneration and Ethics (CGRE) Committee on issues of concern reported by employees. The outcomes of matters investigated will be communicated to members of the CGRE Committee by the Chairperson of the Committee.

5.2 Information pertaining to concerns raised will be securely retained until the purpose for keeping them has lapsed, in line with the company's Data Retention Period policy and Data Protection regulations.

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6. REVIEW

6.1 The Audit and Risk Committee shall assess the relevance and adequacy of the policy as and when required.

Date: 14 May 2025

Signed by:

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Mrs. Su Lin Ong

Chairperson of the Audit and Risk Committee

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Mr. Akhtar Dawood

Chairperson of the Board of Directors