

# UHURU

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## CAPITAL LIMITED

### Whistleblower Policy Fact Sheet



#### INTRODUCTION

Uhuru has developed a whistleblower policy – a mechanism for all employees, portfolio companies, affiliates and other stakeholders of Uhuru Investment Partners (“Uhuru”) to disclose particulars of suspected or alleged unlawful, unethical or irregular conduct in the firm, without fear of reprisal.

This Fact Sheet is a quick reference guide to Uhuru’s whistleblower policy. It is in furtherance of Uhuru’s commitment to integrity and the highest ethical standards in all its activities. Uhuru strives to create an environment in which all Uhuru employees can act with integrity and speak up when they observe inappropriate behavior, without fear of any detrimental effect on their careers.

This policy has been endorsed by the Partners of the Firm and the day-to-day custodian of the policy is Mr. Taiwo Peters who is the Compliance Officer for Uhuru. Uhuru strongly promotes whistleblowing as a means to report wrongdoing and manage risks to the organization. **Uhuru does not tolerate any reprisals against whistleblowers.**

#### UHURU WHISTLEBLOWER GUIDELINES

- 1 Uhuru is committed to ensuring a culture of good and transparent corporate governance without fear of reprisal for employees who disclose unlawful, unethical or irregular conduct by Uhuru, fellow employees or any other person covered by Uhuru’s Whistleblowing Policy.
- 2 An employee should make a disclosure if they believe that improper behavior has occurred, is occurring or may occur as a result of the actions of Uhuru or by a fellow employee.
- 3 An employee is protected in making a disclosure where the disclosure is made in good faith and according to the terms of Uhuru’s Whistleblowing Policy.
- 4 When making a disclosure, an employee can be satisfied that only the persons responsible for investigating the disclosure will be aware of the employee’s identity.
- 5 The identity of an employee who makes a disclosure will not be revealed unless specifically required by applicable laws, regulations and guidelines.
- 6 If an employee’s identity must be disclosed, all necessary steps will be taken to ensure that the employee does not suffer any negative consequences.

#### PROCEDURE FOR FILING A REPORT

1. Employees should disclose any improper behaviour (past, current and anticipated) to a Partner of the Firm, in the first instance.
2. The improper conduct can be raised directly with Uhuru’s Compliance Officer if:
  - i. the concern involves a Partner of the Firm
  - ii. the employee is uncomfortable, for any reason whatsoever, to address the issue with that Partner
  - iii. the employee has disclosed the issue and remains unsatisfied with the response or lack of response
3. If the concern involves the compliance officer or is not satisfactorily handled, then the employee should raise the matter directly with the Managing Partner.

## GUIDELINES FOR MAKING DISCLOSURES

The following guidelines should be followed to ensure that there is sufficient information to proceed with fact finding and further investigations.



### WHAT

1. Details of alleged improper activity
2. What makes it improper?
3. Any evidence? (documents, witnesses)



### WHO

1. Who is involved?
2. Who can confirm the improper activity?



### WHERE

Where did the improper activity take place?



### WHEN

1. When did the activity take place?
2. Is it ongoing?
3. How frequently does it occur?



### HOW

1. How did you become aware?
2. How did the improper activity happen? (e.g. lack of policy or circumvention, etc)



### ANONYMOUS REPORTS

Whistleblower reports may be made anonymously. However, anonymous reports must provide sufficient corroborating evidence to justify the commencement of an investigation. Anonymous reports are less likely to result in an investigation due to the inability of investigators to interview the reporter which may result in difficulties in evaluating the allegations.



### FACT FINDING

The employee under investigation and the person who discloses an impropriety or alleged impropriety, may be accompanied at any fact finding meetings by a fellow employee of their choice (who must be an employee of Uhuru).



### INVESTIGATION

A full investigation will be conducted into all disclosures to determine the facts and the most appropriate way the impropriety should be dealt.



### FINDINGS

The findings of the investigation will be communicated to:

- i. The employee who made the disclosure
- ii. Any individuals under investigation as a consequence of the disclosure
- iii. Uhuru's Partner's and any internal and/or external authorities who will need to consider whether further action should be taken on the basis of the findings of the disclosure



### REMEDY FOR REPRISALS AT WORK

Any employee who is subjected to any occupational detriment may approach any court having jurisdiction for relief and may also pursue any other process allowed or prescribed by the relevant law.

## HOW TO FILE A WHISTLEBLOWER COMPLAINT?



### ONLINE

Use the Online Whistleblower Form



### EMAIL

Email a letter to a partner (in the first instance) describing the improper activity.



### TELEPHONE

Call one of the Partners (in the first instance) to discuss the improper activity.



### IN PERSON

Submit a concern in person.