

Whistleblowing Policy

AFRICA

Version 1.0 2024

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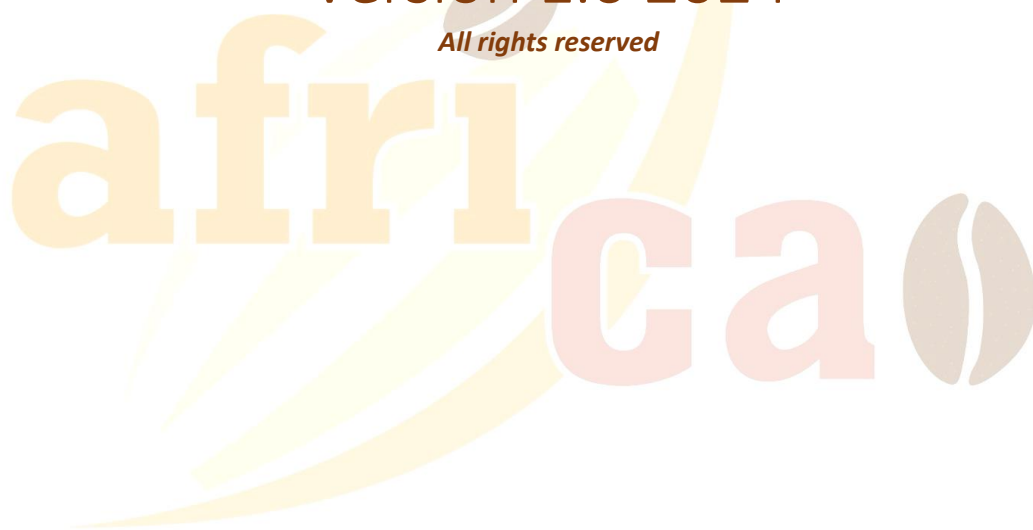


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Introduction

We are committed to conducting our business with honesty and integrity and expect our employees to maintain high ethical standards at work. These standards are outlined in Africao's Code of Ethics.

This Whistleblowing Policy ("Policy") provides means for employees to raise genuine concerns in good faith when they have reasonable grounds to believe that there is any misconduct, malpractice, and/or breach of any applicable law or policy by Africao or any employee.

Purpose

The purpose of this Policy is to establish an internal whistleblowing system that protects whistleblowers and ensures that concerns or wrongdoings falling under the scope of this Policy are reported through the right channels.

Disclaimer

This Policy establishes a generic procedure that shall prevail over any complaint mechanism set in different internal Policies and Procedures of Africao.

This Policy does not refer to personal grievances at work.

This Policy can be amended at any time, and employees shall be informed of any changes.

Application Scope

- **Who Can Raise Concerns**

Concerns may be raised by any collaborator at Africao (including employees, long-term, temporary, and casual staff, interns, consultants working for the company and any other third party), as well as by the company's suppliers and customers.

- **Scope of Concerns**

Concerns may be raised about any collaborator, including managers, a group of employees, a third party, a customer, a supplier, a former employee, or even general systems and procedures used by Africao.

- **Types of Concerns**

Concerns may include (but are not limited to) breaches of applicable laws, policies, or good practices that have already occurred, are still occurring, and/or are about to or likely to occur, relating to:

- Bribery and corruption;
- Financial misconduct, including money laundering;
- Dishonest information disclosure/report;
- Funding or facilitation of terrorism or any armed conflict;
- Unfair discrimination;
- Workers' and consumers' health and safety;
- Human and child rights, including child labor, human trafficking, and any other form of modern slavery;
- The environment, including resource management, biodiversity, and agricultural practices (deforestation, land clearance, etc); or
- Any other breach of applicable laws and regulations.

Useful index:

Ombudservice

The term "ombudservice" refers to the persons who shall receive, address, and investigate any concerns raised under the scope of this Policy (see below paragraph and Annex I).

Whistleblower

The term "Whistleblower" refers to an individual who reports or discloses information about illegal, unethical, or improper activities within an organization, such as fraud, corruption, or violations of laws and regulations.

Reporting procedure

Raising Concerns Internally

Africao expects its collaborators to raise any concerns directly with their Manager. However, if they prefer not to raise it with the Manager for any reason (for example, if the concern involves the Manager), they shall contact a member of the ESG Committee (see appendix 1 for contact details), which is responsible for upholding legal compliance and responsibility matters for Africao, or our trustworthy third-party contact person (see Annex I).

Raising Concerns Externally

If the whistleblower strongly feels that you he or she is unable to raise his or her concern with anyone at Africao (for example, if he or she have genuine and substantial reasons to believe that it would result in danger to him or her or someone else, that there would be a cover-up, that evidence would be destroyed, or that the matter would not be handled properly), he or she may decide to raise the matter externally (see section "Resort to external disclosure").

Handling of Concerns

Once a concern is raised, the ombudservice shall diligently acknowledge, record, and screen all reports. Specifically, the ombudservice shall:

- Record the time, date, and place where you made the disclosure;
- Provide you with a copy of the concern raised, showing that you made the disclosure; and
- Keep the record of the disclosure confidential and safe until the matter is investigated.

Communication Channels

Concerns under this Policy can be raised either verbally or in writing to your Manager or the Head of the ESG Committee.

Handling Verbal Concerns

If the concern is raised verbally, the ombudservice shall:

- Write down all information received using the "whistleblowing reporting template" (see Annex II);
- Attach to the "whistleblowing reporting template" the certificate from Annex III, signed by the whistleblower, indicating that the information was read out, interpreted, and explained in a language understood by the whistleblower, and that he or she accepted the contents and received a copy.

Content of the Report

Whether the disclosure was done verbally or in writing, the whistleblowing report shall contain the information detailed in Annex II.

Investigation procedure

Meeting

Within a timeframe of up to 7 days from the date the concern is raised, either in written or oral form, the ombudservice shall arrange a physical or e-meeting with the whistleblower to discuss the concern.

The whistleblower may bring a colleague or union representative to the meeting, who shall respect the confidentiality of the disclosure and any subsequent investigation.

Authenticity Check

(a) After the due diligence meeting, the ombudservice shall assess whether the disclosure was made in good faith. While all disclosures made in good faith shall be investigated (either through internal inquiries or a more formal investigation), disclosures not considered legitimate shall be disregarded.

Notifications

If a decision is made not to further investigate the matter, the ombudservice shall explain to the whistleblower how the conclusion of an illegitimate disclosure was reached.

If a decision is made to investigate the matter, the ombudservice shall:

- Inform the whistleblower about this decision, indicate who will be handling the matter (i.e., one of the three ombudservice members stated in Annex I), provide their contact information, and specify whether the whistleblower's assistance may or may not be needed; and
- Contact the person whose behavior has been reported and communicate the main object of the ongoing procedure. This person shall have 7 days to present objections or respond.

Conclusive Report

All information gathered through the investigation shall be carefully assessed by the chosen ombudservice. A conclusive report, analyzing the main points of the investigation and expressing a final opinion, shall be provided to the parties involved and Africao's CEO or the Executive Committee.

Whistleblower's protection

Safeguarding confidentiality

Africao shall maintain, to the fullest extent possible and at all times, the confidentiality of the information revealed (including the whistleblower's identity).

Completely anonymous disclosures are difficult to investigate. Africao shall keep the whistleblower's identity confidential and shall only reveal it, when necessary, to those involved in investigating the concern.

A disclosure is a confidential process. After reporting the concern, the whistleblower is expected not to make the contents of the disclosure public. This includes avoiding talking to the media about the disclosure.

Support for Whistleblowers

This Policy encourages openness and supports whistleblowers who raise genuine concerns under this Policy, even if they turn out to be mistaken.

Protection Against Retaliation

Whistleblowers shall not be victimized, punished, or treated differently. A collaborator is victimized at the workplace if, after making a disclosure, the employer or colleagues subject him or her to any of the following:

- Dismissal;
- Suspension;
- Declaration of redundancy;
- Denial of a promotion;
- Transfer against your will;
- Harassment;
- Intimidation;
- Threats with any of the above punishments; and/or
- Discrimination.

Threats or detrimental treatment against whistleblowers are forbidden, and Africao may resort to disciplinary action in such cases.

Reporting Retaliation

If the whistleblower believes that he or she has suffered any such treatment or threats of it, the whistleblower shall:

- Inform any member of the Executive Committee or the ESG Committee immediately; or
- If the matter is not resolved, report it to the appropriate external authority.

Resort to external disclosure

In most cases, the whistleblower should not find it necessary to alert anyone externally as this Policy aims to provide an internal mechanism for reporting, investigating, and remedying any wrongdoing in the workplace.

However, the law recognizes that in some circumstances, it may be appropriate for the whistleblower to report the concerns to an external body, such as a regulator or the police.

Governance system

This Policy will be reviewed annually by the ESG Committee. It will be updated, if necessary, immediately following the review process and approved by the ESG Committee. Each new version of this Policy will be shared to our all our supplier register for reading and approval.

Sanctions

Appropriate sanctions will be undertaken by Africao's Board of Directors, including termination of contracts, or by the external body in case of an external disclosure.

Conclusion

Applying this Policy will enable Africao and all its stakeholders to build a more responsible and trustworthy supply chain while aligning with the global shift towards more responsible and sustainable business practices in commodity trading.

ANNEX I

Contact Ombudservice

11 rue Montalembert 16160 Angoulême, FRANCE

Charles Tellier

SO-B-GREEN

+233 26 625 5519

c.tellier@sobgreen.com

Contact ESG Committee

Tania Romero : trr@africao.ch

Julie Lavorel : ops@africao.ch

Dean Tutic : dt@africao.ch

ANNEX II

Whistleblowing Reporting Template

Whistleblowing ID:

Whistleblower related information

Full name: _____ Occupation: _____

Address: _____

Reporting related information

Date: _____ Time: _____ Place: _____

Is this the first time you disclose a concern? ☐ Yes ☐ No

Disclosure related information

Is this the first time you disclose a concern? ☐ Yes ☐ No

Nature of the concern:

- ☐ Bribery and corruption
- ☐ Financial misconduct, including money laundering;
- ☐ Dishonest information disclosure/report;
- ☐ Funding/Facilitation of terrorism or any armed conflict Unfair discrimination
- ☐ Workers' and consumers' Health and safety
- ☐ Human and Child Rights, including Child labour, Human trafficking and any other form of modern slavery
- ☐ Environment, including resource management, biodiversity and agricultural practices
- ☐ Any other breach of applicable laws and regulations

Date when the wrongdoing happened: _____ Place: _____

Name/s of the person/s involved in the wrongdoing: _____

Details of the concern: _____

Witnesses related information

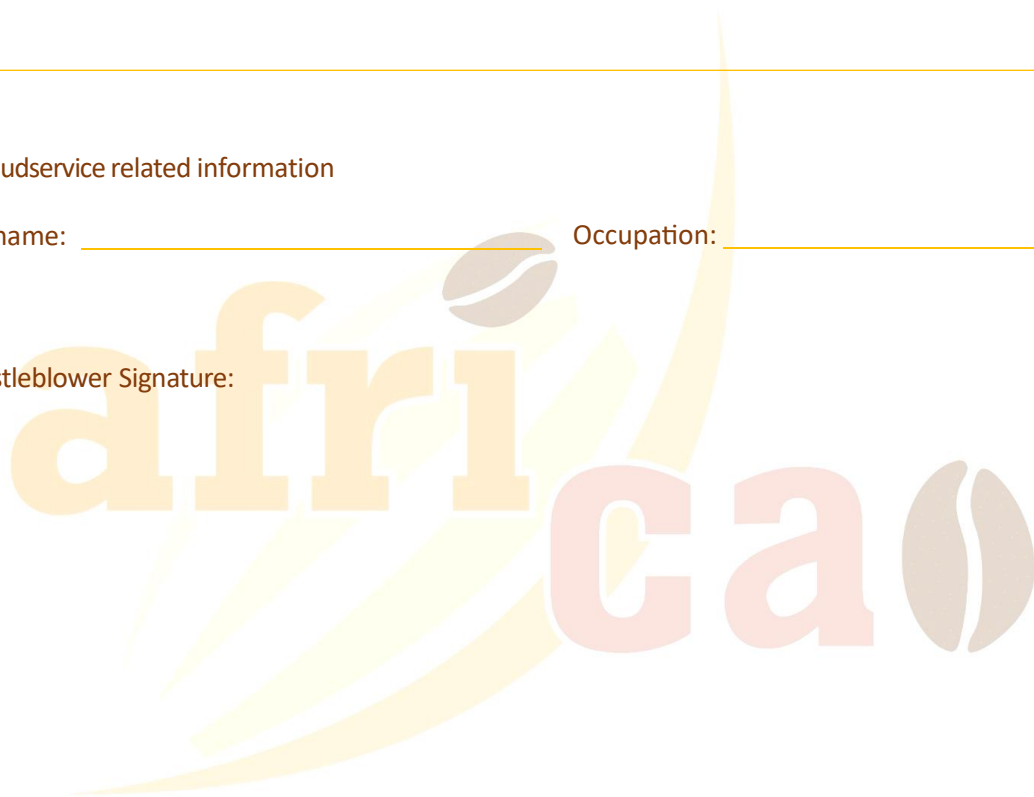
Full name: _____ Occupation: _____

Address: _____

Ombudservice related information

Full name: _____ Occupation: _____

Whistleblower Signature: _____



ANNEX III

CERTIFICATE OF UNDERSTANDING AND CONFORMITY

By signing this certificate, I confirm that I have received a copy of the whistleblowing reporting sheet, that the information written in the sheet was read out to me in a language that I understand and that I agree with and accept such information, which accurately reflects the disclosure made.

Signature: _____

Name: _____

Date: _____ Time: _____ Place: _____

