



Whistle-blowing Policy

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02	21/09/2022	ES

Whistle-blowing Policy

1. Purpose

KubeNet requires its employees, and representatives in any way to observe a high standard of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of KubeNet, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

This whistle-blower policy is intended to encourage and enable all customers, business partners as well as our own employees to raise serious concerns, so that KubeNet can address and correct inappropriate conduct and actions. We consequently ask for your help in identifying areas for improvement, by reporting concerns about violations of KubeNet code of conduct, anti-bribery policy or suspected violations of law or regulation that govern KubeNet operations.

2. Scope

The policy applies strictly to all employees, partners, agents, consultants, contractors and to any other people or bodies associated with KubeNet.

3. Policy

All organisations face the risk of things going wrong or of unknowingly harbouring malpractice. KubeNet have a duty to identify and take measures to remedy all malpractice particularly about issues of fraud and corruption. By encouraging a culture of openness within our organisation we believe that we can prevent malpractice before it happens.

We want to encourage you to raise issues which concern you at work. We recognise, however, that you may be worried that by reporting such issues you will be opening yourself up to victimisation, detriment or risking your job security. Such fears are understandable, this policy is therefore designed provide you with information about the protections offered by PIDA as well as the process by which you may raise your concerns. By knowing about malpractice at an early stage we stand a good chance of taking the necessary steps to safeguard the interests of all staff, protect our organisation and stop fraud and corruption before it happens. In short, do not hesitate to 'speak up' or 'blow the whistle.'

4.Key Risk Areas

You are strongly encouraged to act promptly when faced with non-compliance with any KubeNet policy or procedure, such as KubeNet Code of Conduct or Anti-bribery Policy or any other applicable law or regulation.

Examples may include:

- Financial fraud, criminal offence and other types of inappropriate financial practices or practices that raise questions about KubeNet accounts, financial reporting, internal controls or auditing practices.
- Misconduct of business practices and our Code of Conduct, which could constitute a conflict of interest. Corruption including payment of bribery or facilitation payments, unethical donations, gifts or entertainment to business partners given by KubeNet employees.
- Serious improper management including serious breaches of occupational safety, concerns about environmental pollution, serious issues directed towards an employee, for example, discrimination, violence or sexual assault or serious violation of local policies.

It is in the best interest of KubeNet that breaches of the Policies and Rules are reported. For this reason, KubeNet will not tolerate retaliation against anyone who reports non-compliance with the Policies and Rules, regardless of whether their claim can be substantiated.

5.Policy Compliance

KubeNet will investigate thoroughly any actual or suspected breach of this policy, or the spirit of this policy. Employees found to be in breach of this policy may be subject to disciplinary action which may ultimately result in their dismissal.

6.Further guidance

Further guidance on this policy must be addressed to your director.