



Whistleblowing Guidance Notes

Introduction

Barak Fund Management Ltd ('BFML') has implemented a Whistleblowing Policy in view of its commitment to conduct business with honesty, integrity, and transparency where employees are expected to maintain high standards in accordance with established policies and procedures.

Overview

The aim of the Whistleblowing Policy is to report in good faith, concerns, suspected or actual occurrence of illegal, unethical or inappropriate behaviours or practices without retaliation.

Scope of Application

The policy applies to employees working for BFML, Barak (UK) Ltd, Riparian Advisory (Pty) Ltd and its affiliates, including:

- All employees (permanent and temporary)
- Shareholders/Directors
- Consultants
- Contractors and sub-contractors
- Any other person directly and/or indirectly connected with the above entities

What is whistleblowing- what to report?

Whistleblowing is the reporting of information relating to any suspected wrongdoing which may adversely affect the organisation. This may include the following which is however not exhaustive:

- General malpractice suspicion
- Gross misconduct or behaviour including immoral, unethical conduct
- Any suspected breach of regulations/laws
- Any serious breach of internal policy
- Any suspected criminal behaviour, including bribery, corruption, fraud or misuse of office and office property
- Any breach of the Code of Conduct Policy
- Any action aiming at concealing any of the above

If you come across a genuine concern relating to the above, it is your responsibility to report it under this policy.

Any concern relating to suspicion of money laundering should be raised with the Money laundering Reporting Officer (MLRO) and in his/her absence the Deputy MLRO directly and does not fall under this policy.

Reporting Obligations

The whistle-blower who suspects any irregularity must report to BFML Compliance and /or CFO who shall determine whether an investigation will have to be conducted and by whom.

The whistle-blower may as well report to his/her supervisor, then the next highest level or another level of management, including the BFML Board member.

Supervisors, managers and/or board members who receive the whistle-blower's report must further report the matter to BFML Compliance and/or CFO for appropriate action.

Whistleblowing Helpdesk

All whistleblowing reporting shall be made using the dedicated email account which has been communicated internally to all employees.

Any whistleblowing reporting can be made anonymously if so desired.

Confidentiality

All disclosures will be treated in strict confidentiality, unless the matter requires investigation by law enforcement agencies, in which case a subpoena will be required to reveal the identity of the whistle-blower.

The whistle-blower is also required to keep confidential the suspected disclosure made and must not discuss it outside the organisation.

Consequences of reporting in bad faith

For any reporting made in good faith, there will be no adverse consequences. BFML will not entertain or tolerate any attempt on the part of any person to apply any sanction or disadvantage or to discriminate against a whistle-blower acting in good faith.

Anyone retaliating against the whistle-blower (who reported in good faith) will be subject to disciplinary proceedings.

Any false or malicious allegations will be subject to disciplinary actions.

All queries/questions on Whistleblowing must be directed to Compliance for guidance to the following emails:

anju.vythilingum@barakfund.com, ketty.matadeen@barakfund.com or kevin.ramsamy@barakfund.com

Compliance, Mauritius

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