

1. Purpose

This policy aims to provide a clear and transparent framework for employees, contractors, and stakeholders to raise concerns, complaints, or grievances regarding unethical behaviour, workplace issues, or violations of company policies without fear of retaliation. It also establishes a secure channel for whistleblowing.

2. Scope

This policy applies to all employees, contract workers, vendors, suppliers, and third-party stakeholders of RUBATEK SARL, regardless of rank, designation, or location.

3. Policy Statement

RUBATEK SARL is committed to fostering an open and transparent work environment where all stakeholders feel empowered to raise concerns or grievances. The company ensures that all reports are addressed promptly, objectively, and confidentially.

The Rubatek SARL Whistleblowing Policy aims to facilitate a culture wherein whistleblowing is done in a responsible manner and in terms of statutory guidelines. The Policy further describes the Rubatek SARL's commitment to supporting and protecting whistle blowers, the steps that should be taken if an individual wishes to speak out (whistle blow) about improprieties in the workplace (known as making a "protected disclosure") and how the Rubatek SARL shall respond.

4. Definitions

- **Grievance:** A concern or complaint raised by an individual regarding workplace treatment, harassment, discrimination, working conditions, etc.
- **Whistle-blower:** An individual who reports misconduct, unethical behaviour, policy violations, or unlawful practices within the organization.
- **Retaliation:** Any act of punishment or unfair treatment directed at a whistle-blower or complainant for raising a concern.

5. Grievance Redressal Procedure

Step 1: Informal Resolution

- Complainants are encouraged to resolve issues informally by discussing with their immediate supervisor.
- If not resolved or uncomfortable doing so, the formal process may be initiated.

Step 2: Formal Grievance

- Submit a written grievance to the Human Resources (HR) Department or designated Grievance Officer.



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services@rubatekrdc.com

RCCM: 20-B-290 • ID.NAT: 05-H5300-N60988A

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Likasi, Province du Haut-Katanga, RD Congo

- Include details such as date, nature of grievance, involved parties, and any supporting documents.

Step 3: Investigation

- HR/Grievance Officer will acknowledge the grievance within 5 working days.
- A fair and impartial investigation will be conducted.
- The process will be completed within 30 working days, wherever feasible.

Step 4: Resolution and Feedback

- Outcomes and corrective actions will be communicated to the complainant.
- If dissatisfied, the complainant may appeal to senior management.

6. Whistle-blower Mechanism

Reporting Channels

- **Email:** hse@rubatekrdc.com
- **Hotline:** +243-974466638 (confidential, 24/7)
- **Written Letter:** To be sent to the Head of Compliance, marked "CONFIDENTIAL"

Scope of Whistle-blower Complaints

- Fraud or corruption
- Health, safety, or environmental violations
- Harassment or discrimination
- Breach of legal obligations or company policies

Protection of Whistle-blower

- Whistle-blowers will be protected against any form of retaliation or victimization.
- Anonymous complaints are allowed, but must be detailed and specific for proper investigation.

7. Confidentiality

All grievances and whistle-blower reports will be handled with the highest level of confidentiality. Information will only be shared on a need-to-know basis.

8. False Allegations

Making false or malicious complaints may lead to disciplinary action, including termination.



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9. Training and Awareness

RUBATEK SARL will periodically train and educate employees about their rights and responsibilities under this policy.

10. Policy Review

This policy will be reviewed as and when required by the HR and Compliance Departments and updated accordingly.

DATE:

Approved by:

Mr. Rahul Pandya
Manager



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