



## WHISTLEBLOWER POLICY

### 1. POLICY STATEMENT

**Bulsho Business Group (BBG)** upholds a steadfast commitment to unwavering honesty and integrity in all aspects of its operations. In the event that this commitment is compromised or called into question, BBG diligently strives to identify and rectify such circumstances. As part of our corporate policy, we ensure that individuals who possess reasonable grounds to suspect an employee, manager, or any other individual associated with the company of engaging in or intending to commit an offense that could potentially harm the company's business or reputation, are encouraged to report such wrongdoing. BBG firmly denounces any misconduct and takes swift action in addressing these matters. Our dedication to maintaining a professional and ethical environment remains paramount, reinforcing our commitment to conducting business with the utmost integrity.

The whistleblowing policy has been put in place to:

1. **Encourage Disclosure:** The policy aims to promote a culture where employees, partners, or managers feel empowered to disclose any information or behavior that raises concerns or suspicions. By fostering an environment of openness, BBG seeks to uncover potential wrongdoing and address it promptly.
2. **Protect Complainants:** The policy is designed to safeguard individuals who come forward with reports of misconduct from any form of retaliation or reprisals. BBG is committed to ensuring that those who raise concerns are shielded from adverse consequences, fostering a safe and supportive environment for reporting.
3. **Fair Treatment:** BBG is dedicated to treating all parties involved in an investigation in a just and equitable manner. This involves conducting thorough and impartial investigations, providing equal opportunities for all individuals involved to present their perspectives, and ensuring that decisions and actions are based on objective and unbiased evaluation of the evidence.
4. **Confidentiality:** BBG recognizes the importance of maintaining confidentiality to the greatest extent possible during the whistleblowing process. Information shared by complainants will be handled sensitively and disclosed only on a need-to-know basis, ensuring the protection of their identity as far as reasonably practicable and in compliance with legal requirements.

5. Corrective and Disciplinary Action: Should wrongdoing be substantiated through a comprehensive investigation, BBG is committed to taking appropriate corrective and disciplinary actions. This may include implementing measures to rectify the situation, holding individuals accountable, and applying disciplinary measures commensurate with the severity of the misconduct. By taking decisive action, BBG aims to reinforce its commitment to integrity and uphold the highest ethical standards throughout the organization.

## 2. PURPOSE

The purpose of this whistleblowing policy is to encourage current and former employees, contractual third parties or partners to communicate events that raise serious concerns about **Bulsho Business Group** and will support staff who report illegal practices or individuals who violate the BBG's policies.

## 3. SCOPE

This policy applies to all employees of BBG's as well as contractual third parties or partners doing business with the company.

## 4. DUTY TO REPORT MISCONDUCT

It is the duty of all employees, contractual third parties or partners to report misconduct or suspected misconduct, including fraud and financial impropriety to the board. This includes misconducts such as but not limited to:

- Providing false or misleading information, or withholding material information on BBG's financial statements, accounting, auditing or other financial reporting fraud or misrepresentation.
- Pursuit of material benefit or advantage in violation of BBG's Conflict of Interest Policy.
- Misappropriation or misuse BBG'S resources such as funds, supplies, or other assets.
- Unauthorized alteration or manipulation of computer files
- Destroying, altering, mutilating, concealing, covering up, falsifying, or making a false entry in any records that may be connected to an official proceeding, in violation of federal, provincial, or state law or regulations or otherwise obstructing, influencing, or impeding any official proceeding, in violation of federal, provincial, or state law or regulations.
- Violations of Somalia federal, provincial, or state laws that could result in fines or civil damages payable by BBG's or that could otherwise significantly harm BBG 's reputation or public image.
- Unethical business conduct in violation of any BBG's policies and/or Code of Conduct.
- Danger to the health, safety, or well-being of employees and/or the general public
- Forgery or alteration of documents
- Authorizing or receiving compensation for goods not received or services not performed, or paying for services or goods that are not rendered or delivered.
- Authorizing or receiving compensation for hours not worked

## 5. ACTING IN GOOD FAITH

Any person who files a complaint alleging misconduct must act in good faith and have reasonable grounds to believe that the information disclosed indicates wrongdoing.

No employee, third party contractor or partner who makes a denunciation in good faith will be subject to retaliation. Retaliation is any direct or indirect harmful action that threatens a person or is taken against a person who has reported an event or action. Anyone who retaliates against a person who has made a report in good faith is subject to disciplinary action up to and including dismissal.

However, making allegations that are deemed unfounded and malicious or knowingly false may result in disciplinary action up to and including termination of employment.

## 6. PROCEDURE

A complaint may be submitted in writing to [Confidential.reporting@bulshobusiness.com](mailto:Confidential.reporting@bulshobusiness.com) or call +252613004004.

The written statement must include the following information:

- Description of the offence
- Date on which the complainant became aware of the offence.
- Name of the person suspected of the offence.
- Actions taken (if applicable) before filing a complaint or allegation (i.e. talk to the supervisor)

**6.1** The complainant will not be dismissed, demoted, suspended, threatened, harassed, or otherwise discriminated against because of the communication of a genuine concern. Any employee of BBG who contravenes this policy when dealing with a complainant may be terminated. Similarly, any member of the Board who violates this policy in his or her dealings with a complainant may have his or her relationship with BBG terminated.

**6.2** A person is not required to prove the truth of an allegation but is required to act in good faith and provide sufficient evidence to the person contacted to demonstrate that there are sufficient grounds for concern. The number of contacts between the complainant and the investigative body will depend on the nature of the question and the clarity of the information provided. The investigating body may request additional information from the complainant.

**6.3** All complaints will be treated in a confidential and sensitive manner. In addition, the complainant must be able to remain anonymous, except in cases where the nature of the disclosure and/or resulting investigation makes it necessary to disclose his or her identity (e. g. investigations or judicial proceedings). In such cases, all reasonable measures must be taken to protect the complainant from any prejudice resulting from a disclosure.

## **7. INVESTIGATION**

**7.1** BBG ensures that all relevant cases, including those that are suspicious but unproven, will be thoroughly reviewed and analyzed by a competent individual designated by the company. Depending on the circumstances, this may entail involving a legal adviser or an accountant to investigate. Throughout the process, utmost confidentiality will be maintained to the extent possible, safeguarding the identities of those involved and the information shared.

**7.2** If the investigation yields evidence of misconduct or wrongdoing, BBG is committed to taking appropriate corrective action. The nature of this action will be determined based on the severity of the situation and may include disciplinary measures, implementing necessary changes, or other appropriate remedies. The findings of the investigation will be communicated to the whistleblower, as well as their supervisor, ensuring transparency and accountability within the organization.

**7.3** By adhering to these practices, BBG aims to create an environment where concerns are thoroughly addressed, integrity is upheld, and any necessary actions are taken in an appropriate and timely manner.

**BULSHO BUSINESS GROUP CEO**

Hamdi Omar 