



# Whistleblowing Policy

## KOKO GROUP OF COMPANIES

Document #: KNL POL-005

Version 2.0

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## Review, Verification, & Approval

	Name	Signature	Role	Date
Prepared by	Angie Muigai	<i>Angie Muigai</i>	Director, People	19 June 2025
Reviewed by	Ashaba Kamahoro	<i>Ashaba K</i>	Head of Legal & Compliance, Group	4 July 2025
Approved by	Matt Schiller	<i>Matt Schiller</i>	President & COO	4 July 2025

## Document version

Revision History				
Revision #	Description of Change	Author	Effective Date	Approved By
2.0	Annual policy update	Angie Muigai, Valentine Odhiambo	4 July, 2025	Matt Schiller

The signatures above certify that this policy has been reviewed and accepted, demonstrating that the signatories are aware of all the requirements and are committed to ensuring their provision.

## Applicability

### KOKO Group of Companies

1) KOKO Networks Limited (Mauritius), 2) KOKO Networks Limited (Kenya), 3) KOKO Networks Global Services (Kenya), 4) KOKO Networks Private Limited (India), 5) KOKO Networks Uganda Limited, 6) KOKO Networks Rwanda Limited, 7) Saarus Innovations Private Limited (India), and 8) KOKO Networks (UK) Limited or any other KOKO Group subsidiaries that may be incorporated in the future. Together, we will refer to these as “KOKO Group of Companies” or “KOKO Group” or “KOKO”.

# Whistleblowing policy

## 1. About This Policy

At KOKO Group of Companies, we are committed to conducting our business with the highest levels of honesty, integrity, and accountability. We recognize that all organizations may, from time to time, encounter misconduct or situations where legal or ethical standards are not met, either knowingly or unknowingly. We believe that fostering a culture of openness is crucial to identifying and addressing such issues promptly.

This Whistleblowing Policy is designed to ensure that employees and stakeholders feel confident and protected when raising genuine concerns.

Specifically, it aims to:

- Encourage the timely reporting of suspected wrongdoing, with assurance that concerns will be taken seriously, investigated thoroughly, and treated with sensitivity.
- Provide clear guidance on how to raise concerns and outline the procedures to follow once a concern is reported.
- Guarantee that individuals who raise genuine concerns in good faith will be protected from retaliation, even if the concern is found to be mistaken.

This policy applies to all employees, officers, freelancers, contractors, volunteers, interns, casual workers, agency workers, suppliers, customers, and partners across the KOKO Group of Companies. It does not form part of any employee's employment contract and may be amended from time to time at the company's discretion.

## 2. Oversight and Responsibilities

The People and Legal Departments are responsible for implementing, operating, and overseeing this policy on a day-to-day basis. They ensure that all staff, especially those involved in handling concerns or conducting investigations, receive regular and appropriate training.

This policy will be reviewed at least annually to ensure its legal and operational effectiveness. All employees are encouraged to speak up if they observe misconduct or risk and may suggest improvements to this policy by contacting their line manager or the People Department.

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The Legal Department and the People Department are jointly responsible for implementing, overseeing, and continuously improving this Whistleblowing Policy.

- The People department is primarily responsible for reviewing this policy, promoting awareness of the policy across the organization, coordinating training on whistleblowing procedures, and supporting employees who raise concerns in good faith. On sensitive matters, the People department works closely with the Legal department.
- The Legal Department is responsible for ensuring the policy complies with applicable laws and regulations, overseeing investigations into serious allegations, and reporting significant matters to senior management and, where necessary, external authorities.

### 3. What is Whistleblowing?

Whistleblowing refers to the act of reporting concerns about suspected wrongdoing, unethical behavior, or dangers that may be present in the workplace or associated with company operations. Concerns may relate to:

- Criminal conduct or activity
- Non-compliance with legal, regulatory, or professional obligations
- Bribery or corruption
- Facilitation of tax evasion or money laundering
- Financial mismanagement, theft, or fraud
- Miscarriages of justice
- Risks to health, safety, or well-being
- Environmental damage or threats to sustainability
- Breaches of internal policies and procedures
- Any other illegal or unethical conduct

A whistleblower is anyone who raises a genuine concern relating to the above. Such concerns may arise within KOKO's operations or through its partners, suppliers, or activities in the communities we serve.

It is important to distinguish whistleblowing from personal grievances. Whistleblowing involves misconduct that affects others or the organization. Personal complaints - such as disputes with colleagues, dissatisfaction with appraisals, or scheduling issues - should be addressed through the [Anti-Harassment and Bullying Policy](#). However, if a personal issue

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reveals broader misconduct (e.g., discrimination, harassment, or safety violations), it may be considered a whistleblowing concern.

If you are unsure whether your concern qualifies as whistleblowing, you should seek guidance from your line manager or the People Department.

## 4. Raising a Whistleblowing Concern

For employees, we encourage you to raise concerns with your line manager or the People Department, either verbally or in writing. A meeting will be arranged as soon as possible to discuss the concern, and you may bring a colleague or representative. A written summary will be shared with you, along with an outline of how the matter will be handled.

If you prefer to raise a concern confidentially or anonymously, and for external stakeholders, you can use any of the following channels:

i. Confidential hotline:

Country	Toll-Free Number
India	02250972696
Kenya	0800 222 284
Rwanda	Currently not available, use online reporting
United Kingdom	0800 066 8877

- ii. Online form: <https://kokonetworks.ethicspoint.com> **(Managed by an external party for confidentiality purposes)**
- iii. Suggestion/complaint boxes: Located at selected facilities **(for employees only)**
- iv. Direct communication: Line manager, People Department, or Leadership Team **(for employees only)**

Anonymous reports will be accepted but may limit our ability to investigate thoroughly. EthicsPoint, our independent reporting platform, guarantees confidentiality and securely forwards your report to us.

## 5. Confidentiality

We strive to maintain the confidentiality of all whistleblowers. If your identity must be disclosed for investigation purposes, we will discuss this with you. While anonymous reports are accepted, we encourage you to share your identity to facilitate a more effective investigation.

Support and guidance are available through the People Department or EthicsPoint, which operates a confidential helpline.

## 6. Investigation and Outcome

Once a report is received, an initial assessment will be conducted to determine whether a formal investigation is required. You may be asked to provide additional information. Where necessary, an investigator or team with relevant expertise may be appointed.

We will keep you informed throughout the process. While specific details may be withheld for confidentiality, you will receive updates on the progress and resolution of the case. Outcomes may include disciplinary action, procedural changes, or referral to external authorities.

If a report is found to be made maliciously or in bad faith, disciplinary action may be taken against the whistleblower.

The following general process and timeline will be followed:

Submission	Acknowledgement	Assessment	Investigation	Outcome & Communication	Closure
Day 0	Within <b>5</b> business days	Within <b>10</b> business days of receipt	<b>10–30</b> business days, depending on complexity	Within <b>5</b> business days after the investigation	Within <b>5</b> business days of the outcome

## 7. If You Are Not Satisfied

We strive to address all concerns in a fair and transparent manner. If you are dissatisfied with the process or outcome, you may raise the matter further with the People Department or use the Grievance Procedure outlined in the employee handbook.

## 8. External Disclosures

This policy is designed to address concerns internally. However, in some cases, it may be appropriate to contact an external authority such as a regulator. Reporting to the media is rarely relevant and could violate confidentiality obligations. We strongly encourage seeking advice before making external disclosures. EthicsPoint is available for confidential consultation.

Whistleblowing may sometimes relate to third parties, such as customers or suppliers. We advise reporting such issues internally first.

## 9. Protection and Support for Whistleblowers

We are committed to protecting whistleblowers from retaliation. Any form of detrimental treatment, including dismissal, demotion, harassment, or threats, is strictly prohibited and will be addressed through disciplinary action.

If you believe you are being mistreated after raising a concern, report it to your line manager or the People Department immediately. Similarly, anyone found to be retaliating against a whistleblower will face disciplinary consequences.

## 10. Training

Training on this policy will be provided to employees, and external stakeholders will be made aware of it through publication on our website, targeted training sessions, posters, outreach sessions, and engagement materials.

## 11. Review and Continuous Improvement

This policy will be reviewed annually and updated as necessary to reflect changes in law, risk landscape, and internal learnings. Feedback from employees and stakeholders will inform these updates.

## 12. Contact Information

For questions, advice, or to raise a concern:

- People Department: [people@kokonetworks.com](mailto:people@kokonetworks.com)
- Or report anonymously via [kokonetworks.ethicspoint.com](https://kokonetworks.ethicspoint.com)

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