

## **SECUMAX Whistleblower Policy**

**1. Purpose** SECUMAX is committed to fostering an open and transparent work environment where employees, contractors, and stakeholders feel safe to report concerns about unethical, illegal, or improper conduct. This policy establishes a framework for reporting, investigating, and addressing such concerns while protecting whistleblowers from retaliation.

**2. Scope** This policy applies to all employees, directors, contractors, suppliers, and business partners associated with SECUMAX.

**3. Policy Statement** SECUMAX encourages the reporting of suspected wrongdoing, including but not limited to:

- Fraud, corruption, or theft.
- Violations of laws or regulations.
- Breaches of SECUMAX policies, including those on modern slavery, bribery, and AML.
- Health and safety risks, including hazards to the public.
- Any other unethical or improper conduct.

## **4. Responsibilities**

### **4.1. Employees and Stakeholders**

- Report concerns promptly and in good faith.
- Provide as much detail and evidence as possible to support the investigation.

### **4.2. Management**

- Ensure concerns are addressed promptly and confidentially.
- Prevent retaliation against whistleblowers.
- Foster a culture of trust and accountability.

**5. Reporting Mechanisms** Whistleblowers can report concerns through the following channels:

- Confidential hotline: [Insert hotline number].
- Dedicated email: [Insert email address].
- In writing to the Compliance Officer: [Insert mailing address].

**6. Protection for Whistleblowers** SECUMAX guarantees the following protections for whistleblowers:

- **Confidentiality:** The identity of the whistleblower will be kept confidential unless required by law.

- **Non-Retaliation:** Retaliation against whistleblowers is strictly prohibited. Any instances of retaliation will result in disciplinary action.

## 7. Investigation Process

- Reports will be acknowledged within [Insert timeframe].
- A preliminary assessment will be conducted to determine the validity and scope of the concern.
- A thorough investigation will follow, led by the Compliance Officer or an appointed independent investigator.
- The whistleblower will be informed of the outcome where appropriate, subject to confidentiality requirements.

**8. False or Malicious Reports** Reports made in bad faith or with malicious intent will not be tolerated and may result in disciplinary action.

**9. Training and Awareness** SECUMAX will provide training to employees and stakeholders to:

- Raise awareness about the whistleblowing process.
- Emphasize the importance of ethical conduct and reporting mechanisms.

**10. Monitoring and Review** This policy will be reviewed annually or as necessary to ensure its effectiveness and alignment with best practices.

**11. Approval** This policy has been approved by the SECUMAX Proprietor and is effective as of [Insert Date].

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