

OMS WHISTLEBLOWING POLICY

Introduction

The Whistle Blowing policy is developed to safeguard employees of Ocean Marine Solutions Limited who may report activities that are considered to be unethical in line with the OMS culture, policies and procedures.

Whistle blowing in the workplace is a type of internal whistleblowing—when someone who works for a company, organization, or corporation exposes wrongdoing. In most cases, the whistleblower is an employee or an External Stakeholder driver.

A “whistleblower” is defined by this policy as an employee or a stakeholder (external) of the company who reports an activity that he/she considers to be illegal, dishonest, unethical or otherwise in contravention of the company policy.

Types of Whistle Blowing

Internal Whistle Blowing

Internal Whistle Blowing is an internal compliance program that allows potential whistleblowers and other employees to report tips regarding fraud or misconduct to the company internally, it is known as internal whistleblowing. In most cases, internal whistleblowers have the right to report their tips anonymously through dedicated emails and hotlines so their identity is protected.

External Whistle Blowing

External whistleblowing occurs when someone who has information regarding violations reports the information to the appropriate government agency and respective relevant companies.

When any illegal or wrong doing against the company or against the management of the company is raised outside the organization it is known as external whistle blowing.

Whistleblowers who report tips externally can protect their anonymity by retaining legal representation. For employees who fear demotion, termination, harassment, or other forms of retaliatory action, anonymity can be critical for both internal and external whistleblowing.

How OMS will promote the whistleblowing culture:

1. Open door culture: The Whistle blowing policy is successful only when the OMS Culture enables an open-door culture. Any employee can raise their concerns against any wrongdoing, illegal activities or malpractices without any fear. The senior management will make the best efforts to build an ethical and open-door culture in OMS.

2. Right Training: Employees would be trained to know their rights, duties on whistleblowing and its procedure. The Employee would be trained on various aspects of the whistle blowing so that they can raise concern freely against any wrong doing happening in OMS. They would be trained to differentiate between raising a grievance and reporting a whistle blowing.

3. Involvement of all stakeholders: All the stakeholders, vendors, contractors, suppliers etc. would be given visibility on the OMS Whistleblowing policy. They would be clearly aware of the whistleblowing procedure to raise any concern. The policy would also be made available on the OMS company website.

4. Need to Act: Whistle blowing policy and procedure would be implemented firmly. Appropriate actions would be taken once the complaint is received. There is the most critical gap between a problem raised by an employee and the time taken to act. This gap would be reduced with a speedy timeline of a month to conclude on a complaint submitted to make the OMS whistleblowing policy successful.

5. Communication: Continuous official communications would be done through inter office memos, newsletters and presentations to promote whistleblowing within OMS.

Procedures for Reporting Possible Cases of Ethical Misconduct

Ocean Marine Solutions Limited as a company recognizes the importance of raising concerns about non-ethical and non-compliance matters of the company both internally in Ocean Marine Solutions Limited and externally with stakeholders on matters that may have significant impact on the Ocean Marine Solutions Limited culture.

The Whistleblowing platforms provide employees and stakeholders (External) with safe and accessible channels to report any unethical incidents related to the company's ethics and code of conduct of Ocean Marine Solutions Limited.

Whistleblowing Platforms

Employees and Stakeholders (External) have the underlisted options for reporting possible cases of ethical misconduct and compliance matters:

- Report to - a Line Manager/Supervisor, Head, Human Resources, Head, Internal Audit, Risk & Compliance, Company Secretary.
- Report through the whistleblowing email address: whistle@ocean-ms.com
- Report through the whistleblowing hotlines: **09087280339, 08072346121,08054005925**

Zero Tolerance for Retribution

The fear of retribution is one of the biggest barriers to reporting company breaches. Ocean Marine Solutions Limited shall under no circumstance tolerate retribution against employees or stakeholders (external) that report possible cases of misconduct or a possible violation of a company policy.

Retribution in the workplace can take many forms such as being the target of bullying or harassment, physical assault, being unfairly dismissed or through the use of derogatory or condescending remarks. Acts of retribution constitutes a serious misconduct, which, if substantiated could result in disciplinary action and

could end in the dismissal of the employee or the termination of a business contract in the case of an external stakeholder.

Employees or External Stakeholder whistleblowers who believes that he/she is being retributed against must contact the Head, Human Resources, Head Internal Audit, Risk and Compliance and the Company Secretary promptly.

Specific Protection Rights and Limitations for Whistleblowers

Protection for whistleblowers is provided in two major areas: Confidentiality and Protection against retribution. All efforts will be made to protect the confidentiality of the whistleblower.

However, the identity may have to be disclosed in situations that may require compliance with national or state laws, and circumstances that may warrant the provision of accused individuals (employees) with legal rights of defense.

The right of a whistleblower for protection against retribution does not include immunity for any personal wrongdoing that is alleged and/or under investigation.

An employee who intentionally files a false report of wrongdoing after due investigations will face the appropriate disciplinary action in line with the company's staff handbook and disciplinary matrix.

An external stakeholder who intentionally files a false report of wrongdoing after due investigations will face the appropriate terms of contract termination clauses and be barred from conducting business with Ocean Marine Solutions Limited.

Investigation of Reported Matters

Prompt Resolution of Reported Cases

All reported cases shall be acknowledged on receipt through any of the reporting platform channels. All reports will be extensively investigated and resolved promptly within a month of the receipt of the complaint. Each case will be closed with an investigation report submitted to the Managing Director.

Roles and Responsibilities

The company has a responsibility to promote an environment where employees are comfortable to reveal processes which are a breach without facing the fear of reprisal.

As a company, we are committed to a fair and transparent mechanism approach for reporting allegations of misconduct using an efficient compliance programme.

All staff are the accountable partners in ensuring a smooth implementation of the Ocean Marine Solutions Limited Whistle Blowing Policy.

This policy document shall be updated periodically in line with evolving company and stakeholder requirements.