

Whistleblower Policy of Meghna Insurance Company Limited

1. Introduction

1.1 Meghna Insurance Company Limited ("the Company" or "MICL") is committed to upholding the highest standards of integrity, transparency, and ethical conduct. This Whistleblower Policy provides a framework for employees, customers, suppliers, and other stakeholders to report concerns or complaints regarding unethical, illegal, or improper conduct within the Company. The policy aims to create an environment where individuals feel safe to report such matters and ensures that appropriate action is taken to address and resolve them.

2. Scope

2.1 This policy applies to all directors, employees, officers, contractors, suppliers, customers, and other stakeholders of Meghna Insurance Company Limited.

3. Reporting Channels

3.1 Confidential Reporting Channel: Reports of unethical behavior, misconduct, or violations of law or company policy should be made through the designated confidential reporting channel. The following options are available for reporting:

- a. **Internal Reporting:** Employees are encouraged to report concerns to their immediate supervisor, department head, or the designated compliance officer.
- b. **Anonymous Reporting:** Anonymous reports can be made through the designated whistleblowing hotline or online reporting portal. Anonymous reporters are encouraged to provide sufficient detail to facilitate investigation, but their identities will be kept confidential to the extent permitted by law.

3.2 Written Report: Reports should be made in writing and include as much detail as possible, including the nature of the concern, the individuals involved (if known), and any supporting evidence.

3.3 Protection Against Retaliation: MICL prohibits retaliation against individuals who make good faith reports of unethical behavior, misconduct, or violations of law or company policy. Any form of retaliation against a whistleblower will be subject to disciplinary action, up to and including termination of employment.

4. Confidentiality and Protection

4.1 Confidentiality:

- a. The Company will treat all whistleblower reports with strict confidentiality, ensuring that information related to the whistleblower's identity and the reported concerns is disclosed only on a need-to-know basis during the investigation.
- b. The Company will make every effort to protect the identity of the whistleblower, subject to applicable laws and regulations.

4.2 Protection Measures:

- a. The Company is committed to protecting whistleblowers from any form of retaliation. Any individual who reports concerns in good faith will be safeguarded against adverse employment actions, harassment, discrimination, or other forms of retaliation.
- b. Retaliation against whistleblowers is strictly prohibited and will be subject to disciplinary action.

5. Investigation and Resolution

5.1 Investigation Process:

- a. Upon receipt of a whistleblower report, the Company will promptly and impartially investigate the concerns raised. The investigation may involve interviews, document review, and any other appropriate measures to gather facts and evidence.
- b. The Company will ensure that the investigation is conducted objectively, and all parties involved will be treated fairly and with respect.

5.2 Reporting to Authorities:

- a. If the reported concerns involve illegal activities or violations of applicable laws, the Company may report the matter to the relevant authorities as required by law.

5.3 Corrective Actions:

- a. If the investigation substantiates the reported concerns, the Company will take appropriate actions to address the issues identified. This may include disciplinary measures, policy revisions, additional training, or any other actions deemed necessary to prevent recurrence.

6. Record Keeping

- 6.1 The Company will maintain complete and accurate records of all whistleblower reports, investigations, and actions taken. These records will be securely stored for the appropriate duration as required by applicable laws and regulations.

7. Communication and Awareness

- 7.1 The Company is committed to creating awareness of this Whistleblower Policy among employees and stakeholders. The policy will be communicated through various means, such as employee orientations, training programs, the Company's intranet, and other appropriate channels.

8. Policy Review

- 8.1 This Whistleblower Policy will be periodically reviewed by the management of Meghna Insurance Company Limited to ensure its effectiveness and compliance with relevant laws and regulations. Any updates or amendments to the policy will be communicated to all employees and stakeholders.

9. Approval:

This Whistleblower Policy has been approved by the Board of Directors of Meghna Insurance Company Limited and is effective from 22 April 2024.