

The logo for Real People, featuring the text "REAL PEOPLE™" in a bold, sans-serif font, enclosed within a dark, rounded rectangular border with a slight 3D effect.

WHISTLE BLOWER POLICY

Real People Kenya Ltd.

S. No	Version	Revision Date	Author	Areas Revised	Scope	Document Owner
1.	1.0.0	April 2019	Violet Okoth	Initial Draft	GVR	Quality Assurance
2.	1.1.0	June 2020	Violet Okoth	Scope, Whistle blower channel,	RPKL	Quality Assurance
3.	1.2.0	June 2023	Violet Okoth	4.2.1,4.2.4,4.3.1,4.3.2,4.3.3	RPKL	Internal Audit and Risk

1. Introduction

- 1.1 This policy is intended to encourage staff and external parties to report suspected or actual occurrence(s) of illegal, unethical, or inappropriate events (behaviours or practices) without fear of retribution/ revenge.
- 1.2 A whistle blower is an employee, clients of Real People Kenya Ltd or any other outside person who in good faith, reports allegations of Prohibited Practices, Misconduct or who submits a complaint due to non-compliance with the company's policies.
- 1.3 A whistle blower can also be a witness who in good faith, provides information, including testimony or written or electronic evidence, while participating in the organization investigation, audit or other inquiry related to such matters.

2. Scope

- 2.1 The scope of this policy includes all Real People Kenya Limited. This includes the responsibility to report concerns through the reporting channels in the Real People Kenya Limited.

3. Statement of Policy

- 3.1 The purpose of this policy is to encourage reporting of any ill practice or suspected fraudulent cases in the organization.
- 3.2 The institution endorses the principle that an employee or its director should serve the institution honestly and faithfully.

4. Policy

- 4.1 The Real People Kenya Ltd endorses the principle that an employee or its director should serve the institution honestly and faithfully.
 - 4.1.1 The whistle blower should promptly report the suspected or actual event to his/her supervisor or other suitable person.
 - 4.1.2 If the whistle blower would be uncomfortable or otherwise reluctant to report to his/her supervisor, then the Whistle-blower could report the event to the next highest or another level of management or send email to ethics hotline@realpeople.co.ke.
 - 4.1.3 The Whistle-blower can report the event with his/her identity or anonymously.
 - 4.1.4 The Whistle blower shall receive no retaliation or retribution for a report that was provided in good faith – that was not done primarily with malice to damage another or the organization.

- 4.1.5 A whistle blower who makes a report that is not done in good faith is subject to discipline, including termination of the employee relationship, or other legal means to protect the reputation of the organization and members of its staff.
- 4.1.6 Anyone who retaliates against the Whistle-blower (who reported an event in good faith) will be subject to discipline, including termination of employee status.
- 4.1.7 Crimes against person or property, such as assault, rape, burglary, etc., should immediately be reported to local law enforcement personnel.
- 4.1.8 Supervisors, managers and members who receive the reports must promptly act to investigate and/or resolve the issue.
- 4.1.9 The whistle-blower shall receive a report within five business days of the initial report, regarding the investigation, disposition or resolution of the issue. Where this timeline is not possible, the whistle blower will be appraised on the progress and expected timelines for resolution.
- 4.1.10 If the investigation of a report, that was done in good faith and investigated by internal personnel, is not to the Whistle-blower's satisfaction, then he/she has the right to report the event to the appropriate legal or investigative agency.
- 4.1.11 The identity of the Whistle-blower, if known, shall remain confidential to those persons directly involved in applying this policy, unless the issue requires investigation by law enforcement, in which case members of the organization are subject to summons.

4.2 Whistle blower Protection, Confidentiality and Anonymity

- 4.2.1 Anonymous reports shall be investigated unless determined to be malicious after a preliminary investigation. However, reporters are encouraged to identify themselves to the Audit & Risk department through Internal Audit and Risk Officer or other entities within the organization to facilitate investigations or follow-up actions on the reported matter.
- 4.2.2 The reporters shall ensure that information is provided timely and, in enough detail, so that the matter can reasonably be considered by the organization.
- 4.2.3 Insufficient information may result in the fact that an investigation cannot be initiated. Moreover, anyone reporting anonymously should note that whistle blower protection may not be invoked in accordance with this Policy.
- 4.2.4 The organization will keep the identity of an Employee or External party who identifies him or herself to the Internal Audit and Risk Officer confidential when reporting suspected Prohibited Practices or other wrong doings, confidential inside and outside the organization, unless the Whistle blower in writing consents to disclosure.

4.2.5 Nevertheless, the identity of the Whistle blower can be disclosed if the organization is requested to disclose such information by a national judicial authority and Real People's Board of Directors agrees to comply with such a request.

4.2.6 The identity can also be disclosed if the Employee or External party made allegations that were knowingly false or made with reckless disregard as to whether they were true or false.

4.2.7 Employees or External parties who make allegations that are false will not be protected by this Policy and may be subject to sanctions. The organization may initiate legal proceedings against External Parties that provide false or malicious allegations against Real People or present and former Real People staff.

4.3 **Investigation of Reported Retaliation**

4.3.1 Based on the reported retaliation, Internal Audit and Risk Officer shall at its own discretion launch an investigation into the matter. The investigation shall be carried out in accordance with the Investigations and Enforcement Policy.

4.3.2 The Internal Audit and Risk Officer shall investigate if the alleged retaliatory action has been triggered by a reporting activity by the Employee or External Party.

4.3.3 The Internal Audit and Risk Officer may recommend immediate actions in accordance with the organization's rules and policies and contractual terms, as decided upon by the Chief Executive Officer and the Board Audit & Risk Committee, would there be a need for immediate protection of the Whistle blower.

4.3.4 To avoid a conflict of interest, Whistle blowers shall normally not take part in an investigation except as witnesses. Furthermore, Real People is not obliged to report to the Whistle blowers on the progress of its investigations.

4.4 **Types of Concerns to be Reported**

4.4.1 All employees, Directors and officers of Real People Kenya Ltd have a responsibility to report concerns. This policy deals with reporting concerns related to the following areas:

4.4.1.1 **Financial Reporting-** examples include: falsification or destruction of business or financial records, misrepresentation or suppression of financial information, non-adherence to internal financial reporting policy/controls.

4.4.1.2 **Suspected Fraudulent Activity** - examples include: theft, insider trading, market manipulation, and corrupt practices including giving or receiving bribes or other improper benefits.

4.4.1.3

Breaches of the Code, other compliance policies and Laws and Regulations- examples include: conflicts of interest, illegal deceptive or anti-competitive sales practices, other violations of governing laws and regulations and non-adherence to internal compliance policies.

5. Whistle blower Channels

- 5.1 For cases where the whistle blower is an external party, they are encouraged to report incidents through the ethics and hotline0 email address. i.e. ethicshotline@realpeople.co.ke and the investigations to be carried out by the Audit & Risk Department.
- 5.2 For those cases where the whistle blower is an employee of RPKL especially for cases where supervisors may be involved, the whistle blower can channel the information through the Board Audit and Risk Committee email address i.e. barc@realpeople.co.ke.
- 5.3 The investigations will be done by the RPKL Audit & Risk team and the external expertise depending on the magnitude of the reported incident.
- 5.4 The reports will be sent to the Board Audit & Risk Committee and copied to the Chief Executive Officer.

6. Policy Compliance

- 6.1 An employee found to have violated this policy may be subject to disciplinary action, up to and including termination of employment.
- 6.2 This policy is to be reviewed every two years and any changes to the policy will require RPKL Board approval.

End

Signed By: Dr. Robert Shibutse.

CEO – RPKL



DATE xxxxxx