



TDC GHANA LTD

WHISTLEBLOWER POLICY



1. Introduction

- TDC Ghana Ltd. (the "Company") is committed to upholding the highest ethical standards in all aspects of its business operations and encourages employees, contractors, consultants, and vendors to report concerns about unethical, illegal, or improper activities. This Whistleblower Policy aims to ensure that such concerns are addressed promptly, confidentially, and without fear of retaliation. By implementing this Policy, the Company seeks to safeguard its business and protect its reputation.

2. Scope

- This Policy covers serious concerns that could significantly impact the Company's operations and performance, such as:
 - Breach of the Company's Code of Business Conduct;
 - Breach of terms and conditions of employment and related rules;
 - Intentional financial irregularities, including fraud or suspected fraud;
 - Violation of any law or regulation, including, but not limited to, corruption, bribery, theft, fraud, coercion, and willful omission;
 - Gross or willful negligence causing substantial and specific danger to health, safety, and the environment;
 - Manipulation of Company data or records;
 - Theft of confidential information;
 - Gross wastage or misappropriation of Company funds or assets.
- Please note that the above list serves as examples and is not exhaustive. It provides a broad understanding of the types of concerns that can be reported under this Policy. We encourage individuals to come forward with any concerns they may have, even if they do not precisely align with the examples given.

3. Reporting Channels

- The following communication channels are available to individuals for reporting concerns:
 - Immediate supervisor or manager;
 - Independently managed whistleblower number [0257956170];
 - WhatsApp messaging number: [0257956170];
 - Whistleblower Email Box: whistleblower@tdcghana.com, guaranteeing confidentiality.
 - In-Person: Employees may request a confidential in-person meeting with:
 - Company Secretary (designated personnel);
 - Head of Legal;
 - Chief Internal Auditor;
 - Head of Corporate Planning & Communication or
 - Head of HR & Administration.


Whistleblowers should endeavour to ensure that reports are factual, rather than speculative, and, contain as much specific information as possible to facilitate a thorough review and investigation.

4. Protection Against Retaliation

- The Company strictly prohibits retaliation against any individual who makes a report in good faith or assists in an investigation. Retaliation includes, but is not limited to, termination, demotion, harassment, or discrimination. Any employee found to engage in retaliatory behaviour will face disciplinary action, up to and including termination.

5. Confidentiality and Anonymous Reporting

- The Company recognises the importance of confidentiality in whistleblower matters. While individuals are encouraged to identify themselves when reporting concerns, anonymous reporting is permitted and protected under



this Policy. The Company will make reasonable efforts to maintain the confidentiality of the whistleblower's identity, to the extent permitted by law. However, anonymous reporting may hinder the Company's ability to investigate and effectively address the issue.

6. Reporting Process and Investigation

- Upon receiving a whistleblower report, the Managing Director or Board Chair will constitute an investigation committee, which will promptly initiate an investigation. The Managing Director or Board Chair may, at his or her discretion, consider involving any external investigators for investigation. The investigation will be conducted fairly, impartially, and with due regard for the rights of all parties involved. The investigation may involve gathering and reviewing relevant documents, conducting interviews, and taking any appropriate remedial action.

7. False or Malicious Reporting

- The Company takes false or malicious reporting seriously as it undermines the integrity of the whistleblower process. Disciplinary action, up to and including termination, will be taken against anyone discovered to have knowingly provided false or malicious information.


8. Non-Retaliation Obligations

- All employees are required to completely cooperate with any internal investigations that result from whistleblower reports. Retaliation against any employee who provides information or assists in an investigation is strictly prohibited.



9. Feedback to the Whistleblower

- The Company recognises that the whistleblower has the right to receive confirmation that their concerns have been properly addressed. Accordingly,



he or she will receive as much feedback as is permissible under the circumstances, subject to legal constraints.

10. Reward for Reporting

- The whistleblower will receive 5% of the amount of money recovered if the disclosure of misconduct leads to the recovery of a substantial amount of money or the arrest and conviction of an accused person. If the disclosure does not result in a financial recovery, the Managing Director, with the approval of the Board, will determine an appropriate reward.

11. Communication and Awareness

- The Company will communicate and disseminate this Policy to all employees, contractors, consultants, and vendors. The Policy will be accessible on the intranet or equivalent platform. In addition, the Company will provide training to ensure that employees are aware of the Policy and the importance of reporting concerns.

12. Record Keeping

- The Company will maintain records of all whistleblower reports received, investigations conducted, and subsequent actions taken. These records will be securely stored and retained in accordance with applicable laws and regulations.

13. Review and Amendment

- The Company will periodically review and update this Policy as required to ensure its continued effectiveness and compliance with changing laws and regulations and alignment with best practices.

Date of Review: