

## Group Whistleblowing Policy:

### Main Highlights

#### Scope and objectives

The Mizzi Organisation group (MO) is committed to maintaining high ethical standards in all areas of work and practice based on the principles of honesty and integrity and conducts its business in line with these expectations and in accordance with all applicable laws and regulations.

Directive (EU) 2019/1937 (the EU Whistleblowing Directive) creates a framework for persons who acquired information on certain breaches in connection with their work-related activities and serves to set minimum standards for the protection of persons reporting said breaches. The Directive was transposed into Maltese legislation by virtue of Act LXVII of 2021, amending the Protection of the Whistleblower Act, Chapter 527 of the Laws of Malta.

As part of this commitment, MO recognises the value and importance of its employees reporting suspected incidents and improper practices and strongly supports these disclosures. It is a cornerstone of the **MO Group Whistleblowing Policy** (*this can be downloaded from the MO website*) that employees should feel comfortable in bringing forward any concerns in the knowledge that such concerns will be taken seriously, kept strictly confidential, and that there will be no detrimental action which may cause unjustified detriment to the person reporting said concern/improper practice.

This Policy is designed as a mechanism for individuals to raise any concerns which they may have about improper practices within the workplace in a respectable and effective manner and to provide Whistleblowers with information on how such concerns will be dealt with by MO. The objectives of this Policy shall therefore be as follows:

- (a) To enable the Whistleblower to file disclosures through an internal reporting channel in a secure and confidential setting;
- (b) To grant the person operating the internal reporting channel the necessary powers to be able to investigate any reports of improper practices in an effective manner and to ensure diligent follow-up;
- (c) To protect the Whistleblower from potential risk of detrimental action which may ensue as a direct or indirect consequence of the disclosure; and
- (d) To inform all MO employees of their rights and obligations insofar as these relate to whistleblowing and to ensure that all MO employees are aware of the Directive and the Act, and how these apply.

This Policy should be read in conjunction with the Employee Handbook/Manual in place within the respective MO company, but shall override any other Whistleblowing policies which may be in place at subsidiary level within MO. MO's Internal Audit Department has overall responsibility for the effective operation of this Policy.

## How to raise an internal disclosure

Whistleblowers wishing to file a disclosure shall do so through the internal reporting channel by completing the **MO Group Whistleblowing Disclosure Form** (*this can be downloaded from the MO website*) and submitting it directly and exclusively to the Whistleblowing Reporting Officer (WRO) as identified in the next section, by email as per the details outlined in the next section. Upon request by the Whistleblower, the WRO shall set up a physical meeting within a reasonable timeframe.

MO ensures to protect the confidentiality of the identity of the Whistleblower, as well as of any third party mentioned in the report. MO further ensures that non-authorised staff members shall not have access to such reports. When filing the disclosure, the Whistleblower should aim to provide sufficiently detailed information for the purposes of enabling the WRO to gather an understanding of the alleged breach in question.

Upon receipt of a disclosure, the WRO shall acknowledge the receipt of the report within seven (7) days of that receipt and shall then carry out an assessment on the accuracy of the allegations made in the report, including through actions such as an internal enquiry, an investigation, prosecution, an action for recovery of funds, or the closure of the procedure, whilst keeping the Whistleblower informed of the progress of the assessment.

The WRO may ask the Whistleblower to provide further information during the course of the investigation. The WRO shall ensure to diligently follow-up on any disclosure filed by a Whistleblower and shall provide feedback on the outcome of the disclosure to the Whistleblower within a period not exceeding three (3) months from the date of the acknowledgement of receipt, or if no acknowledgement was sent to the Whistleblower, within a period not exceeding three (3) months from the expiry of the seven (7) day period after the report was made.

The Whistleblower may file an internal disclosure to the Chairman of the Board of Directors of MO if the Whistleblower has reasonable grounds to believe that the WRO is or may be involved in the alleged improper practice, or if the Whistleblower has reasonable grounds to believe that the WRO is, by reason of any relationship or association with a person who is or may be involved in the improper practice alleged in the disclosure, not a person to whom it is appropriate to make the disclosure.

## Whistleblowing Reporting Officer (WRO)

MO appointed the following independent officials as WRO:

- **Mr Charles J. Farrugia**  
**Audit Committee Chairman**  
Email: [WRO@mizzi.com.mt](mailto:WRO@mizzi.com.mt)
  
- **Mr Giancarlo Millo**  
**Group Chief Internal Auditor**  
Email: [WRO@mizzi.com.mt](mailto:WRO@mizzi.com.mt)