

## WHISTLEBLOWING POLICY

### 1. PURPOSE

- 1.1 BlueLife is committed to high standards of ethical, moral and legal business conduct. In line with this commitment, and BlueLife's commitment to open communication, this Whistleblowing Policy (the 'Policy') aims to provide an avenue for employees to raise concerns and have the reassurance that they will be protected from reprisals or victimization for whistleblowing.
- 1.2 All employees are therefore encouraged to raise genuine concerns about possible improprieties in the conduct of our business, whether in matters of financial reporting or other malpractices, at the earliest opportunity and in an appropriate way.
- 1.3 Furthermore, all employees are also required to raise genuine concerns regarding all forms of sexual harassment occurring at BlueLife including, but not limited to unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature.
- 1.4 This Policy is designed to support our values, ensure employees can raise concerns without fear of suffering retribution, and provide a transparent and confidential process for dealing with concerns.
- 1.5 The purpose of this Policy is to encourage and enable employees of BlueLife to report any action or suspected action taken within BlueLife that is illegal, fraudulent, unethical, or in violation of any adopted BlueLife policy or code. For the sake of clarity, this includes any action or suspected action that has been reported by a third party to an employee.
- 1.6 This Policy applies to any matter which is related to BlueLife's business but does not relate to private acts of an individual not connected to the business of BlueLife.

### 2. SAFEGUARDS

- 2.1 Harassment or victimization for reporting concerns under this Policy will not be tolerated.
- 2.2 Every effort will be made to treat the complainant's identity with appropriate regard for confidentiality.
- 2.3 This Policy encourages employees to put their names to allegations because appropriate follow-up questions and investigation may not be possible unless the source of the information is identified. Concerns expressed anonymously will be explored appropriately, but consideration will be given to:
  - the seriousness of the issue raised;
  - the credibility of the concern; and
  - the likelihood of confirming the allegation from attributable sources.

- 2.4 Allegations made in bad faith may result in disciplinary action being taken by BlueLife against an employee making an allegation based on bad faith.

### 3. PROCEDURE

- 3.1 If an employee believes reasonably and in good faith that malpractice exists in the work place, then he or she should report this immediately to the Chief Executive Officer or the Compliance Officer.

*NB In case the CEO and Compliance Officer are believed to be conflicted or involved in the issue, the case should be reported to the Chairman of the Audit & Risk Committee.*

- 3.2 The earlier a concern is expressed, the easier it is to take action.
- 3.3 Although the employee is not expected to prove the truth of an allegation, the employee should be able to demonstrate to the person contacted that the report is being made in good faith.
- 3.4 Employees who have raised concerns will be informed of who is handling the matter, how they can make contact with that person and if there is any further assistance required.
- 3.5 Feedback will be provided without any infringement of any duty of confidentiality owed by BlueLife.
- 3.6 Employees' identities will not be disclosed without prior consent. Where concerns cannot be resolved without revealing the identity of the employee raising the concern, (e.g., evidence is required in court) we will enter into a dialogue with the employee concerned as to whether and how we can proceed.

### 4. HANDLING OF THE WHISTLEBLOWING

- 4.1 The action taken by BlueLife in response to a report of concern under this Policy will depend on the nature of the concern. The Audit and Risk Committee and/or Corporate Governance Committee of BlueLife's Board of Directors shall receive information on each report of concern and follow-up information on actions taken.
- 4.2 Initial inquiries will be made to determine whether an investigation is appropriate, and the form that it should take. Some concerns may be resolved without the need for investigation.
- 4.3 The amount of contact between the complainant and the person or persons investigating the concern will depend on the nature of the issue and the clarity of information provided. As such, further information may be sought from or provided to the person reporting the concern.
- 4.4 BlueLife shall, where it deems necessary, seek external advice when investigating claims. In doing so, BlueLife shall always endeavour to preserve the anonymity of an employee or third party that has raised a genuine concern in good faith.