

WHISTLEBLOWING & SPEAK UP

SPEAK UP | CONFIDENTIALITY | NO RETALIATION

OUR COMMITMENT

At Senan Holding, we encourage everyone working with or for us to raise concerns about suspected misconduct, illegal activity or breaches of our values. Concerns raised in good faith will be handled fairly, as confidentially as practicable and without retaliation.

SCOPE

This Policy applies to directors, officers, employees, subsidiaries and controlled operations, and extends to contractors, consultants, suppliers and business partners where they act for or represent Senan Holding.

WHEN TO SPEAK UP

- Raise concerns about suspected fraud, theft, bribery, corruption or financial irregularity.
- Report possible breaches of law, contractual obligations, Company policies or ethical standards.
- Speak up about conflicts of interest, abuse of authority, harassment, discrimination, retaliation or misuse of Company assets.

YOUR PROTECTIONS

- Concerns made in good faith will be treated seriously, assessed fairly and handled as confidentially as practicable.
- Retaliation against anyone who raises a concern, provides information or supports an investigation in good faith is prohibited.
- A concern may be raised based on a reasonable belief; complete evidence is not required before speaking up.

HOW TO RAISE A CONCERN

- Raise a concern through a line manager, Human Resources, the designated compliance channel or another formally communicated reporting route.
- Where a normal reporting route is unsuitable, use an alternative available channel to ensure the concern can be considered independently.
- Provide relevant facts and documents where available, while avoiding any unnecessary disclosure of confidential information.

HANDLING & ACCOUNTABILITY

- Reports will be recorded, assessed and, where appropriate, investigated by authorized and impartial personnel.
- Employees and representatives are expected to cooperate fully with authorized internal reviews, investigations, auditors and legal advisers.
- Confirmed breaches may result in corrective, remediation or disciplinary action, subject to applicable law and Company procedures.

IMPLEMENTATION & REVIEW

Senan Holding will communicate this Policy, support a culture of openness and accountability, provide appropriate awareness and training, and periodically review its effectiveness to strengthen ethical conduct and trusted reporting across the Group.