
CUSTODIAN INVESTMENT PLC

WHISTLE-BLOWING POLICY

July, 2019

1. Purpose

Custodian Investment Plc requires Directors, Officers and Employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Employees and representatives of Custodian must practice honesty and integrity in fulfilling their responsibilities and must comply with all applicable laws and regulations.

This Policy establishes Guidelines for Custodian Investment Plc and its subsidiaries ("Custodian" or "Company") to manage a whistle-blowing mechanism for reporting wrongdoing within the Company.

2. Objectives

The Whistle-blowing Policy is intended to encourage and enable employees and stakeholders such as vendors, shareholders, job applicants and the general public to bring unethical conduct and violations of laws and regulations to the attention of an internal authority so that action can be taken to verify the allegation and apply appropriate sanctions or take remedial action to correct any harm done. It is the responsibility of all Board members, officers, employees and volunteers to report concerns about violations of Custodian's Code of Ethics or suspected violations of law or regulations that govern the Company's operations.

3. No Retaliation

It is contrary to the values of Custodian for anyone to retaliate against any person who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of the Company. Where a whistle-blower has been subjected to any detriment, he may present a complaint to the Board and/or regulators.

4. Whistle-Blowing Procedure

- 4.1 Whistle-blowing complaint shall be lodged through the Company's website and not from a complainants' personal email in order to guarantee the anonymity of the complainant.
- 4.2 The following officers shall be recipients of whistle-blowers' email messages:
 - a. The Managing Director

- b. Head of Internal Audit
- c. The Company Secretary

4.3 The team responsible for managing disclosures obtained through the whistle-blowing mechanism shall:

- a. Review reported cases and bring them to the notice of the Board Audit, Compliance and Risk Management Committee.
- b. Provide the Board Audit, Compliance and Risk Management Committee with a summary of reported cases, cases investigated, the process of investigation and the results of the investigations.

4.4 The Board shall have the responsibility to accord priority to the effectiveness of the whistle-blowing mechanism and continually affirm publicly, its support for and commitment to the Company's whistle-blower protection mechanism.

5. Good Faith

Any person filing a written complaint concerning a violation or suspected violation must act in good faith and have reasonable grounds for believing the information disclosed indicates a violation.

6. Review Period

This Policy shall be reviewed as deemed necessary.

**Approved by the Board of Directors
July, 2019**