

# Whistleblower Policy

## 1. Introduction

This Whistleblower Policy is established to provide a framework for employees, contractors, and other stakeholders of Sunda Energy Plc (the **Company**) to report any concerns regarding bribery, financial misconduct, and breach of company policies. This policy ensures that all reports are handled confidentially and that retaliation against those who report in good faith is strictly prohibited.

## 2. Scope

This policy applies to all employees, contractors, suppliers, and other stakeholders of Sunda Energy Plc, its subsidiaries and affiliates.

## 3. About this policy

We are committed to conducting our business with honesty and integrity, and we expect all staff to maintain high standards in accordance with our Responsibility Statement. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring and to address them when they do occur.

## 4. Purpose

The purpose of this policy is to:

- Encourage employees and other stakeholders to report any concerns regarding bribery, financial misconduct, and breach of company policies.
- Ensure that all reports are handled in a confidential and sensitive manner.
- Protect whistleblowers from retaliation or harassment.
- Ensure that appropriate actions are taken to address and rectify reported issues.

Sunda Energy Plc

Registered office: 2 Leman Street, London, E1W 9US

Executive office: PO Box 404, HASTINGS, TN34 9LF

## 5. Definitions

- Whistleblower: An individual who reports concerns related to bribery, financial misconduct, or breach of company policies.
- Bribery: Offering, giving, receiving, or soliciting something of value to influence the actions of an official or other person in discharge of a public or legal duty.
- Financial Misconduct: Any act of fraud, embezzlement, or improper financial practices.

## 6. Breach of Policies: Reporting Mechanism

Reports can be made directly to an individual's line manager (or superior), or by email to the Independent Chairman of the Audit Committee of the Board of Directors of Sunda Energy Plc.

## 7. Confidentiality

All reports will be treated with the utmost confidentiality. The identity of the whistleblower will be kept confidential to the fullest extent possible, consistent with the need to conduct an adequate investigation.

We do not encourage staff to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible. Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to the Independent Chairman of the Audit Committee and appropriate measures can then be taken to preserve confidentiality. If you are in any doubt, you can also seek advice from Protect, the independent whistleblowing charity, who offer a confidential helpline. Their contact details are at the end of this policy.

## 8. No Retaliation

The Company strictly prohibits any form of retaliation against whistleblowers who report in good faith. Any employee found retaliating against a whistleblower will be subject to disciplinary action, up to and including termination of employment.

## 9. Investigation Process

Upon receiving a report, the designated compliance officer will:

- Acknowledge receipt of the report within 5 number business days.
- Conduct a preliminary assessment to determine the validity of the report.
- Initiate a formal investigation if warranted.
- Ensure that the investigation is conducted impartially and thoroughly.
- Provide feedback to the whistleblower on the outcome of the investigation, while maintaining confidentiality.

## 10. Responsibilities

- Executive Directors and Managers: To encourage an open and transparent environment and support employees in reporting concerns.
- The Board of Directors: To have overall responsibility for this policy
- Audit Committee: To oversee the implementation of this policy, receive and handle reports, and ensure investigations are conducted properly.
- Employees: To report any concerns regarding bribery, financial misconduct, and breach of policies in good faith.

## 11. If you are not satisfied

While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy you can help us to achieve this.

If you are not happy with the way in which your concern has been handled, you can raise it with the chairman of the Audit Committee. Contact details are set out at the end of this policy.

## 12. External disclosures

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.

The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. It will very rarely if ever be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Protect, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. Their contact details are at the end of this policy.

Whistleblowing concerns usually relate to the conduct of our staff, but they may sometimes relate to the actions of a third party, such as a customer, supplier or service provider. In some circumstances the law will protect you if you raise the matter with the third party directly. However, we encourage you to report such concerns internally first. You should contact your line manager, CEO or the Independent Chairman of the Audit Committee for guidance.

## 13. Review of Policy

This policy will be reviewed annually to ensure its effectiveness and relevance. Any changes or updates will be communicated to all employees and stakeholders.

## 14. Conclusion

Sunda Energy is committed to maintaining the highest standards of integrity and ethical conduct. This Whistleblower Policy is an essential part of our commitment to transparency

# SUNDA ENERGY PLC

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and accountability. We encourage all employees and stakeholders to report any concerns and assure them of our full support and protection.

Approved by the Board of Directors on [ ] February 2025

## Key Contacts

CEO	Dr Andy Butler <a href="mailto:andy.butler@sundagas.com">andy.butler@sundagas.com</a> email to request telephone number if preferred
Chairman of the Audit Committee	Dr John Chessher <a href="mailto:john.chesser@sundagas.com">john.chesser@sundagas.com</a> email to request telephone number if preferred
Protect  (Independent whistleblowing charity)	Helpline: 020 3117 2520  Website: <a href="https://protect-advice.org.uk/">https://protect-advice.org.uk/</a>