

Whistleblower Policy

Lion Kallol Limited

Effective From: 01 Jan 2026



The basics on whistleblowing, whistleblower and whistleblower hotline







Whistleblowing: Reporting suspected or actual Misconduct, including illegal, unethical, or improper actions.

Whistleblower: Person (Employee/ Stakeholder) who reports illegal, unethical, or improper actions.

Whistleblower Hotline: is a service that helps employees and others report malpractice and unlawful or unethical behavior within the workplace.

Whistleblower Committee: means a committee authorized to receive Whistleblower Complaints from Whistleblower Hotline.

The benefits of a whistleblower hotline

-  Gives a voice to all stakeholders.
-  Includes all employees in the responsibility of protecting the company.
-  Helps to protect employees and the company against misconduct.
-  Pinpoints tendencies in compliance risk areas.
-  Provides senior management with an overall temperature of the business.
-  Demonstrates that misconduct is taken seriously and dealt with at the highest level.

The importance of speaking up!

Lion Kallol is committed to fairness, equality and justice. Our beliefs guide all that we do - our thinking, our actions and our decisions - as we strive to implement our purpose in an ever more diverse world. Based on these beliefs, all of us at Lion strive to find new ways to improve everyday living, bringing passion and professionalism to our work.

Actions Required from All of Us:

- Take firm, positive and prompt action
- Immediately inform the offender about their inappropriate behavior

- Speaking up



What topics should be reported via the Whistleblower Hotline?

- Abuse of authority
- Unethical behavior
- Negligence causing substantial and specific danger to health and safety
- Manipulation of Company data /records (Ref: [Forgery; Making a false document](#))
- Irregularities, including fraud of any nature (actual or suspected)
- Any unlawful act whether criminal or civil
- Misuse or leakage of confidential/propriety information (Ref: [Information & Communication Technology Act, 2006 \(Sec-63\)](#))
- Misappropriation of Company funds or assets
- Breach of employee Code of Conduct/Ethics Policy or Rules (Ref: [Bangladesh Labour Act, 2006](#))
- Sexual or physical abuse of staff, customers, prospective staff, service providers and other relevant Stakeholders
- Acceptance of kickbacks
- Bribery or corruption (Ref: [The Prevention of Corruption Act, 1947; The Penal Code, 1860](#))
- Claiming of false expense/reimbursement

What topics should be reported via the Whistleblower Hotline?

- Violation of human rights
- Discrimination/victimization/bullying
- Unhealthy team environment
- Fear of retaliation
- Conflict of interest
- Money laundering (Ref: [Money Laundering Prevention Act 2012](#))

The above list is not exhaustive. These examples are provided to illustrate common types of misconduct and concerns that may be reported. Any behavior that violates company policies, legal requirements, or ethical standards - whether listed here or not - should be report through the appropriate reporting channels.

Whistleblower Hotline

Whistleblower can report Complaint to **Whistleblower Committee** through any of the reporting channels mentioned below as soon as possible but not later than 30 consecutive days after becoming aware of the same.



E-mail: ethics@lion-kallol.com



Letter To: Lion Kallol Limited
199 Tejgaon Industrial Area, Dhaka

Whistleblowers have the option to remain anonymous or identify themselves.

Whistleblower Complaint should include the following details:

- i) Detailed description of the concerns (with relevant dates).
- ii) Name and designation of the individuals involved.
- iii) Evidence or source of evidence.
- iv) Reasons why the Whistleblower is particularly concerned about the situation.

External Reporting to Third Parties

In addition to Whistleblower Hotline reporting channels, Whistleblowers may report concerns to appropriate third-party authorities where required or permitted by law. These third parties may include Regulatory authorities, Law enforcement agencies, External auditor & Independent oversight or compliance committees.

When to Report to Third Parties

Whistleblowers may consider reporting directly to external agencies only in the following circumstances:

1. The matter involves senior management and reporting internally may compromise impartiality.
2. There is a perceived or actual conflict of interest within the internal investigation structure.
3. The misconduct relates to legal or regulatory non-compliance requiring notification to statutory authorities.
4. The Whistleblower believes internal reporting may lead to retaliation, suppression, or concealment of evidence.

Use of external reporting channels must be made in good faith and strictly for legitimate compliance, legal, or ethical purposes.

Principles of this Whistleblower Policy

The principles of this Whistleblower Policy are designed to ensure that it is effective, fair, and protective for all parties involved. Below are the key principles:

1. Confidentiality

- Ensure the confidentiality of the Whistleblower's identity to protect them from retaliation.
- Maintain the confidentiality of the information provided to the extent possible.

2. Impartial and Thorough Investigation (Details: Procedures for Investigation)

- Ensure that all reports are taken seriously and investigated impartially and thoroughly.
- Appoint qualified personnel as investigators to conduct investigations.

3. Anonymity

- Allow Whistleblowers to report concerns anonymously if they choose.
- Respect and protect the anonymity of the Whistleblower throughout the investigation Process.

4. Transparency and Communication

- Communicate the Whistleblower Policy clearly to all Employees and Stakeholders.
- Provide regular updates to the Whistleblower about the status and outcome of their report, as appropriate.

Principles of this Whistleblower Policy

5. Documentation and Record-Keeping

- Maintain thorough documentation and records of all reports, investigations, and outcomes.
- Ensure that records are kept securely and in compliance with data protection Regulations.

6. Encouragement of Reporting

- Foster a culture that encourages Employees to speak up about Misconduct fearlessly and without fear of adverse consequences and/or retribution.
- Recognize and, where appropriate, reward Employees who report genuine concerns in good faith.

Procedures for Investigation

Objective: To ensure that all Whistleblower complaints are handled fairly, transparently, and in a timely manner while maintaining confidentiality and protecting all parties involved.

Step 1: Receipt of Complaint

- Complaints are received by the Whistleblower Committee through the designated reporting channels.
- Complaints are logged and acknowledged within 3 working days.

Step 2: Preliminary Review

- The Whistleblower Committee conducts an initial assessment to determine the validity and severity of the complaint.
- If necessary, legal counsel or an external expert may be consulted, requires pre-approval from the Managing Director.
- The Whistleblower is informed that the complaint has been received and will be investigated, maintaining confidentiality.

Step 3: Investigation Planning

- Managing Director appoints investigators or external expert as needed.

Procedures for Investigation

- Resources, including financial and technical support, are allocated for a thorough investigation.
- A detailed investigation plan is prepared, outlining:
 - Responsible investigators
 - Steps for evidence collection and analysis
 - Key dates and timelines

Step 4: Conducting Investigation

- The accused is informed of the allegations and given a fair opportunity to respond.
- Investigators collect evidence, interview witnesses, and review relevant documents.
- The accused must cooperate fully; tampering with evidence or influencing witnesses is strictly prohibited and may result in disciplinary action.
- Identities of the Whistleblower and accused are kept confidential throughout the investigation.

Procedures for Investigation

Step 5: Reporting and Recommendations

- Investigators prepares a comprehensive investigation report, summarizing findings and providing recommendations for corrective or disciplinary action.
- The report is submitted to the Whistleblower Committee for review.
- The Whistleblower Committee forwards its recommendations to the Managing Director, whose decision is final and binding.

Step 6: Communication and Feedback

- The Whistleblower is periodically updated on the progress of the investigation, while maintaining confidentiality.
- Upon completion, the Whistleblower is informed of the outcome to the extent permissible under confidentiality and legal requirements.

Step 7: Timeline

- Preliminary review and planning: within 7–10 days of receipt
- Full investigation: completed within 30–60 days
- Reporting and decision: within 7 days of investigation completion

Anti-Retaliation Measures

Objective: To ensure that Whistleblowers can report genuine concerns in good faith without fear of retaliation, harassment, or adverse consequences.

1. Protection Against Retaliation

- No adverse action shall be taken against any employee, associate, or business partner who, in good faith, report the suspected or wrongful conduct to The Whistleblower Committee, through any designated reporting channel.
- Retaliation includes, but is not limited to:
 - Termination, demotion, or suspension
 - Unjustified negative performance evaluations
 - Harassment, intimidation, or bullying
 - Denial of promotions, benefits, or opportunities
 - Threats or coercion aimed at influencing the Whistleblower's reporting decision

2. Reporting Retaliation

- Any Whistleblower who believes they are facing retaliation should immediately report the matter to the Managing Director.
- All such reports of retaliation will be treated as serious complaints and investigated promptly and impartially.

Anti-Retaliation Measures

3. Investigation and Corrective Action

- Alleged retaliation will be investigated following the same procedures outlined in the Investigation Procedures section.
- If retaliation is confirmed, the individual(s) responsible will be subject to strict disciplinary action, which may include:
 - Written warning or reprimand
 - Suspension without pay
 - Termination of employment or engagement
 - Legal action if applicable

4. Confidentiality and Non-Disclosure

- The identity of the Whistleblower reporting retaliation will be kept confidential to the extent possible.
- Information regarding the investigation will only be shared on a need-to-know basis.

Anti-Retaliation Measures

5. Encouragement and Assurance

- Lion Kallol actively encourages reporting of misconduct and reaffirms that all employees, associates, and business partners are protected under this policy.
- Whistleblowers who report in good faith are not required to have proof of wrongdoing; the company will investigate the reported concern thoroughly and fairly.

6. Good-Faith Requirement

- Protection is provided only to those acting in good faith. Reports made with malicious intent, false information, or personal vendetta may result in disciplinary action against the reporter.

By following these principles, Lion Kallol strengthens its Whistleblower Policy and upholds the highest standards of ethics, conduct, and organizational integrity.

For

李開直

.....
Managing Director

Lion Kallol Limited