

Whistleblower Policy

Purpose

The purpose of the whistleblower policy is to provide assurance that misconduct or wrongdoing in connection to the business is reported, and that Navana personnel (employees and direct contractors) and external parties have a confidential channel to raise concerns for review. A whistleblower policy encourages personnel and external parties to come forward in good faith with credible information on violations of the policies of the organization and requires that the organization will protect the whistleblower from retaliation.

A whistleblower policy signals to all personnel, board members and public that the organization is open to hearing concerns about its practices. The policy demonstrates that the organization values transparency and accountability.

Commitment

Navana Group including its business units (BUs) and profit centers (PCs) is committed to the highest standards of transparency and accountability. Navana Group wants to minimize its exposure to the damage that can occur when personnel circumvent internal mechanisms/procedures. The organization, therefore, requires reporting misconduct or wrongdoing in good faith and will not tolerate retaliation against the whistleblower for reporting concerns in good faith. Navana Group is also committed to protecting, to all possible extent, the anonymity desired by a whistleblower in connection to a reported concern.

Scope

The whistleblower policy applies to all personnel, board members and external parties to Navana Group including its BUs and PCs. This means the organization expects all personnel, board members and external parties to report credible concerns in connection to the business of Navana Group. The concerns to be reported in good faith include but are not limited to corruption, money laundering, conflict of interest, harassment, threat of violence, falsification of information, sexual harassment, discrimination, financial embezzlement, fraud, data privacy breach, misuse of company assets, human rights and labor rights violation.

Personnel grievances such as performance issues, dissatisfaction with career, or salary etc are not in scope of the whistleblower policy.

Whistleblowing

Whistleblowing is used to describe an event when a personnel or an external party exposes information or activity within an organization that is deemed illegal or a breach of the policies of the organization. The wrongful activity being reported will typically, but not necessarily be something that the personnel has witnessed at work.

The personnel or the external party reporting in good faith is called a Whistleblower and her/his disclosure is called Protected Disclosure. A protected disclosure is a communication made in good faith and assures protection of the whistleblower from retaliation.

Procedure for Whistleblowing

Navana Group is open to receiving complaints made in good faith from all available communication channels including email, phone call, text message and mail. In the interest of anonymity, the whistleblower is encouraged to mask her/his identity by all possible means. The whistleblower is also advised to specifically request anonymity when reporting the concerns. A whistleblower may, however, also choose to remain known.

Navana Group is actively invested in committing to anonymity and whistleblower protection in addition to seeking and improving its current mechanism for whistleblowing.

Governance

The whistleblower policy will be typically reviewed every 24 months or earlier as required by law, changes in legal guidelines, changing circumstances in the organization or changes in the procedure.

Reviewed on	9 June 2021 (Vetted by Legal)
Next Review on	June 2023
Approved on	9 June 2021
Approved by	Wahed Azizur Rahman, Group CEO

Interdependencies

Not Applicable
