

DISCIPLINARY POLICY & PROCESS

SecureKloud Technologies Ltd.

Disciplinary Action Process policy

SecureKloud Disciplinary Action Process Policy explains how we address our employees' misconduct or inadequate performance. Employees must be aware of the consequences of their actions. We use this policy to outline our disciplinary procedure.

The policy covers all employees of SecureKloud at all locations.

The stages that may be followed when discipline is deemed necessary include the following:

- o Verbal warning
- o Corrective Actions/Counseling
- o Official written reprimand
- o Disciplinary meeting with appropriate supervisor or manager
- o Final written warning
- o Detraction of benefits
- o Indefinite suspension or demotion
- o Termination

The nature of the offense will be explained to the employee at the beginning of the procedure. The verbal warning may take the form of a simple oral reprimand but also a full discussion as necessary.

The employee must read and sign the written reprimand and final written warning. These documents include the time limit in which an employee must correct their conduct before we take further disciplinary action.

The following scenarios indicate where the disciplinary procedure starts depending on the violation:

Performance Issues:

Disciplinary procedure starts at stage 1. It includes but is not limited to:

- o Failure to meet performance objectives.
- o Attendance issues.
- o Failure to meet deadlines.

Misdemeanours/One-time minor offense:

Disciplinary procedure starts at stage 1. It includes but is not limited to:

- o Rude behaviour to customers or partners.
- o On-the-job minor mistakes.
- o Involuntary Discrimination.

Misconduct/Frequent offender:

Disciplinary procedure starts at stage 5. It includes but is not limited to:

- o Lack of response to counselling and corrective actions.
- o Lost temper in front of customers or partners.
- o On-the-job major mistakes.
- o Unwillingness to follow health and safety standards.

Severe offensive behaviour/Felony:

Disciplinary procedure starts at stage 6. It includes but is not limited to:

- o Corruption/ Bribery.
- o Breach of employment agreement.
- o Harassment/ Voluntary discrimination.
- o Workplace Violence.
- o Embezzlement/Fraud.
- o Substance Abuse.

Managers or HR will choose to repeat stages of our disciplinary procedure as appropriate. This decision depends on employees' reaction to our disciplinary procedure, whether they repent their behaviour and the nature of their offense.

Our disciplinary procedure begins when there is sufficient evidence to justify it. When there is suspicion or hints of misconduct, managers or HR will investigate the matter first.

Appeals are allowed and will be filed to the next line of management as soon as possible.

HR and managers will document every stage of our disciplinary procedure (except the verbal warning.) If appropriate, include necessary information like evidence, testimonies and employee's progress or improvement.

We are obliged to refrain from disciplinary actions that may constitute retaliatory behaviour. A no retaliation company policy will be effective at all times to ensure there is no misuse of our disciplinary procedure.

We have the right to modify this policy or act in any other legal or reasonable way as each case demands. But, we will always enforce discipline in a fair and lawful manner.

Whistleblower Policy

SecureKloud is committed to the highest standards of openness, probity and accountability.

An important aspect of accountability and transparency is a mechanism to enable staff and other members of the Company to voice concerns in a responsible and effective manner.

The policy has reference to the Whistleblower Protection Act of 2011 1.3. It is emphasized that this policy is intended to assist individuals who believe they have discovered malpractice or impropriety. It is not designed to question financial or business decisions taken by the Company nor should it be used to reconsider any matters which have already been addressed under harassment, complaint, disciplinary or other procedures. Once the "whistleblowing" procedures are in place, it is reasonable to expect staff to use them rather than air their complaints outside the Company

The policy is applicable to all employees of SecureKloud at all locations.

Whistleblower protections are provided in two important areas -- confidentiality and against retaliation. Insofar as possible, the confidentiality of the whistleblower will be maintained. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law and to provide accused individuals their legal rights of defence. The Company will not retaliate against a whistleblower. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, or poor work assignments and threats of physical harm. Any whistleblower who believes he/she is being retaliated against must contact the HR Manager immediately. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

This policy is designed to enable employees of the Company to raise concerns internally and at a high level and to disclose information which the individual believes shows malpractice or impropriety. This policy is intended to cover concerns which are in the public interest and may at least initially be investigated separately but might then lead to the invocation of other procedures e.g. disciplinary. These concerns could include;

- Financial malpractice or impropriety or fraud
- Failure to comply with a legal obligation or Statutes
- Dangers to Health & Safety or the environment
- Criminal activity
- Improper conduct or unethical behaviour
- Attempts to conceal any of these

All reports of illegal and dishonest activities will be promptly submitted to the HR Manager who is responsible for investigating and coordinating corrective action.

Employees can register the complaints through email to hr@securekloud.com

Employees with any questions regarding this policy should contact the HR Manager.