

# POLICY ON WHISTLEBLOWING – MILLENNIUM HOUSING DEVELOPERS PLC

## 1. Purpose

Millennium Housing Developers PLC (“the company”), together with its five subsidiaries operating within the same industry, is committed to upholding the highest standards of ethical, moral, and legal conduct in all aspects of its business.

The Board of Directors and Senior Management place strong emphasis on integrity, transparency, corporate governance, and accountability across the Group.

In line with this commitment, this Whistleblowing Policy establishes a formal mechanism through which employees can raise genuine concerns where the interests, reputation, or assets of the organization may be at risk.

The Policy also provides assurance that any individual who reports such concerns in good faith will be protected from retaliation, harassment, discrimination, or victimization.

The Policy applies to all employees within the MHDL Group at every level, including permanent employees, contract staff, temporary personnel, and any other individuals engaged by the Group.

## 2. Scope

This Whistleblowing Policy is intended to cover concerns raised by staff on matters such as:

- Incorrect financial reporting
- Financial fraud
- Unlawful or improper conduct
- Breaches of the Code of Business Conduct, values, and other Company policies
- Any other improper activity that may negatively impact the Company’s ability to achieve its corporate objectives or cause damage to its image and reputation

## 3. Identification of Concerns

An employee or stakeholder who becomes aware of suspected wrongdoing, such as:

- Fraud, corruption, or financial irregularities
- Legal or regulatory violations
- Harassment or unethical conduct
- Health, safety, or environmental risks
- Abuse of authority or misuse of Company assets.

is expected to promptly inform the appropriate authority at the earliest possible instance, in the best interests of the Company.

## 4. Reporting Malpractices and Unethical Behavior

MHDL PLC is committed to conducting its business not only in compliance with applicable laws but also with integrity, transparency, and fairness.

This Whistleblowing Policy provides confidential channels through which employees may raise concerns, seek advice, or report violations relating to business conduct or ethical matters without fear of retaliation.

Timely detection and reporting of malpractices and unethical behavior are essential to protecting the Company's interests. Employees are encouraged to report any known or reasonably suspected wrongdoing at the earliest possible stage.

- All employees, particularly senior staff, are expected to remain vigilant and exercise due diligence in identifying and reporting malpractices or unethical conduct.
- Reports received will be treated seriously, sensitively, and confidentially by designated members of Management, including the CEO and Executive Director.
- All credible concerns will be investigated and, where appropriate, matters will be escalated to the Board of Directors.
- Employees should report wrongdoing even where they are unable to prevent or stop the misconduct themselves.
- Upholding ethical conduct is a fundamental part of the Company's culture; employees must not hesitate to report unethical acts, even if such acts are technically within the law but contrary to accepted ethical standards.

## 5. Purpose of the Whistleblowing Policy.

The purpose of the Policy is to deter and detect malpractices and unethical behavior and to ensure that genuine concerns are raised responsibly, promptly, and confidentially.

The Company is committed to:

- Investigating all bona fide concerns thoroughly and impartially
- Taking appropriate corrective and disciplinary action where required
- Providing feedback to the whistleblower, subject to confidentiality obligations.

The Compliance Officer is responsible for implementing the Policy and coordinating investigations relating to reported concerns or allegations.

## 6. Examples of Reportable Malpractices and Unethical Behavior

The following list is illustrative and not exhaustive:

- Corruption, bribery, or blackmail
- Criminal offences
- Harassment or discrimination
- Fraud (suspected or actual) or financial irregularities
- Failure to comply with Company policies
- Acts or omissions that endanger the safety of any individual
- Breaches of ethical standards of behavior
- Attempts to conceal any of the above

## 7. Reporting Channels

Concern Relates To	Report To
Chairman of the Board	Board of Directors
Any other Director (including CEO)	Chairman of the Board
Senior Management or other employees	Executive Management

## 8. Basis for Acceptance of Concerns for Investigation

Whistleblowers may submit concerns in writing or verbally.

- Where the whistleblower identifies himself or herself by providing a name or contact details, the concern will be investigated even if supporting evidence is not provided.
- Anonymous reports will also be investigated if sufficient background information or independently verifiable details are provided, or if credible documentary evidence accompanies the allegation.

In cases of suspected fraud or misappropriation where immediate action is required to prevent loss to the Company or its customers, the matter should be reported promptly on a verbal basis to Executive Management, followed by a formal report where possible.

## 9. Protection of Whistleblowers

MHDL PLC recognizes the sensitivity of raising concerns and undertakes to maintain strict confidentiality regarding the identity of whistleblowers and the information disclosed.

Managers receiving such reports must manage them with the utmost discretion.

The identity of the whistleblower will not be disclosed except:

- Where required by a court of law or competent tribunal
- With the whistleblower's explicit consent.

Provided the disclosure is made in good faith and based on reasonable grounds, the Company will make every effort to protect the whistleblower from retaliation.

No adverse action, threat, or disadvantage to career prospects will be tolerated. Victimization by any employee will constitute a disciplinary offence.

Making a genuine disclosure will not prejudice any unrelated disciplinary proceedings involving the employee.

Employees are encouraged to use the Policy to protect the Company's interests unless legal obligations or exceptional circumstances require reporting directly to law enforcement or regulatory authorities.

If a whistleblower is dissatisfied with how a concern has been managed or investigated, he or she may escalate the matter to the Chairman of the Board.

## 10. Prohibition of Retaliation or Obstruction

Any attempt to deter, obstruct, or retaliate against an employee for making or intending to make a disclosure will be treated as a serious disciplinary offence.

Employees should avoid making malicious or frivolous allegations. However, concerns raised in good faith will be considered even if the evidence is not conclusive.

Employees should follow the reporting procedures outlined above and limit disclosure of the matter to persons responsible for managing it.

Failure to report known malpractices or unethical conduct may itself be treated as complicity.

All disclosures will be addressed promptly, with appropriate follow-up actions taken, including disciplinary measures, referral to law enforcement where applicable, and review of operational or risk management controls if necessary.

Employees who require guidance are encouraged to consult confidentially with their immediate supervisor, line manager, or the Compliance Officer.

**11. Record Keeping**

The Company shall make every effort to securely maintain all records received under the Whistleblowing Policy for potential audit and legal purposes.

**12. Effective Date of Implementation**

The Policy shall come into effect from 1st April 2026.

