

WHISTLE BLOWER POLICY

Grand Foundry Limited (“the Company”) code of conduct (hereinafter referred to as the code) requires Directors, other volunteers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Employees and representatives of the organisation must practice honesty and integrity in fulfilling their responsibilities and comply with the applicable laws and regulations.

This Whistle Blower Policy is intended to encourage Board members, staff (paid and volunteer) and others to report suspected or actual occurrence(s) of illegal, unethical or inappropriate events (behaviors or practices) without retribution.

1. The Whistle blower should promptly report the suspected or actual event to his/her supervisor.
2. If the Whistle blower would be uncomfortable or otherwise reluctant to report to his/her supervisor, then the Whistle blower could report the event to the next highest or another level of management, including to an appropriate Board committee or member.
3. The Whistle blower can report the event with his/her identity or anonymously.
4. The Whistle blower shall receive no retaliation or retribution for a report that was provided in good faith – that was not done primarily with malice to damage another or the organization.
5. Anyone who retaliates against the Whistle blower (who reported an event in good faith) will be subject to discipline, including termination of Board or employee status.
6. Crimes against person or property, such as assault, rape, burglary, etc., should immediately be reported to local law enforcement personnel.
7. Supervisors, managers and/or Board members who receive the reports must promptly act to investigate and/or resolve the issue.
8. All reported Concerns will be forwarded to the Audit Committee in accordance with the procedures set forth herein. The Audit Committee shall be responsible for investigating, and making appropriate recommendations to the Board of Directors, with respect to all reported Concerns.
9. Directors and other volunteers should submit Concerns in writing directly to the Chair of the Audit Committee. Contact information for the Chair of the Audit Committee may be obtained from the Chief Financial Officer.
10. The Whistle blower shall receive a report within five business days of the initial report, regarding the investigation, disposition or resolution of the issue.
11. Reports of Concerns, and investigations pertaining thereto, shall be kept confidential to the extent possible, consistent with the need to conduct adequate investigation. Disclosure of reports of Concerns to individuals not involved in the investigation will be viewed as a serious disciplinary offense and may result in discipline, up to and including termination of employment. Such conduct may also give rise to other actions, including civil lawsuits.