

Whistle blower policy:

Members of staff are required to report any suspected or presumed incidents of illegal behavior in the activities of Magnus or of serious misconduct or serious infringement of the Company rules, policies or guidelines, or any action that is or could be harmful to the reputation of the Magnus. All such instances, if observed by an employee, should be reported to the CEO in writing. If the incident/s or issue/s pertains to the CEO, then it should be reported to the RC in writing.

Staff must speak up in the case they come across instances of:

- Lapses in SoPs for which corrective action is not being taken;
- Financial discrepancies;
- Improper client management;
- Alleged fraud;
- Corruption;
- Collusion or coercion;
- Money laundering;
- Sexual harassment;
- Misconduct;
- Cases of bullying, harassment and those concerning dignity at work; and
- Any other unlawful activity that is detrimental to the financial interests of Magnus.

If the use of the established reporting mechanisms is not appropriate in view of the circumstances or nature of the incidents (for instance, if there is a conflict of interest or a risk of reprisals, the intended recipient of the report is personally implicated, or the authority initially alerted fails to take appropriate action) employees should report the matter to at least one Director. Incidents may be reported by any means at the disposal of the member of staff and are to be described as accurately as possible.

Any staff member who reports an irregularity, provided that this is done in good faith and in compliance with the provisions of this policy, shall be protected against any acts of retaliation. "Good faith" can be taken to mean the unequivocal belief in the correctness of the reported incidents, i.e. the fact that the member of staff reasonably believes the transmitted information to be true.

Staff members, who make a report in bad faith, particularly if it is based knowingly on false or misleading information, shall not be protected and shall be subject to disciplinary measures.

An officer who reports an irregularity is rendering an outstanding service to colleagues and shareholders by protecting the firm. Such an officer will be protected at all costs. His / her identity will not be disclosed by the firm. If an officer suspects retaliation or is subjected to actual retaliation, he / she should immediately contact the HR or RC. The HR must contact the RC immediately if they have been contacted by such an employee or they suspect any potential risk to such an officer.

Any form of retaliation undertaken by an employee against any person for reporting an irregularity in good faith is an outright case of misconduct and the firm can terminate services of the retaliating officer.