

WHISTLEBLOWER'S PROTECTION POLICY

POLICY STATEMENT:

Codan is committed to ensuring that the Company and all its Officers and Employees act in accordance with the law and comply with the Company's ethical standards. These are set out in our Core Ideology, Code of Conduct and Policies.

Codan recognises that any genuine commitment to detecting and preventing illegal or corrupt conduct and other inappropriate behaviour must include a process whereby Employees can report their concerns freely and without fear of repercussion.

Employees are encouraged to report any issue which they genuinely believe may be contravening our ethical or legal standards, such as, but not limited to, fraud, corrupt conduct or any other form of inappropriate behaviour.

The reporting of such issues will generally be through the normal channels of line management. However in circumstances where an Employee believes it is inappropriate or difficult for matters to be reported through these channels, Codan provides the Whistleblower Protection process through which an Employee is able to express their concerns and protect their identity.