

Triton Middle East LLC wants our employees to know they can provide information on any concerns they have, understand where they can report their concerns, know what happens after they make a report, and ensure they feel safe in providing a report. We also want to let them know about their right to be anonymous as well as how we, as an organization, will ensure they are not subject to any retaliation or other abuse because they made a report.

In Triton Middle East LLC, we aim to ensure:

- Every employee should have the chance to speak up anonymously when they feel we are not adhering to our corporate values. They should have a place to report misconduct, every report will be heard and acted on, and we will make improvements based on the results.
- We believe everyone should be able to make reports anonymously. We commit to protecting informant's identities and they only need to reveal themselves if they choose to.
- We will investigate every report of misconduct. At the end of the investigation, we will document the results and provide feedback when appropriate.

What conduct should be reported

It is important that Triton Middle East outlines what behavior we want to be reported under this policy. We want to hear from you if you witness or know about any behavior that is:

- Fraudulent; ● Illegal; ● Corrupt; ● Dishonest; ● Unethical; ● Violates the law or any legal code;
- Is creating an unsafe environment; ● Breaches any of our company's policies and code of ethics;
- Discrimination; ● Harassment and/or bullying of any kind; ● Any conduct which is detrimental to Triton Middle East and could cause financial or non-financial loss;

Who can Report

The following would be considered an "eligible person" and would fall under this whistleblowing policy.

- Employees (including directors, managers, trainees);
- Contractors, consultants, service providers, suppliers, business partners;
- Former employees;

Options for making a report

- Use Complaint box
- Speak with HR Manager (0551640274)
- Speak with Managing Director
- Via post (PO Box 3350)
- Via phone call (0551640274)

- Via email (paul@triton.me)

Anonymity

Triton Middle East respects and protects your identity if you choose to make an anonymous report. You can choose to remain anonymous while making a report, interacting with case managers during an investigation of your report, as well as after your case is closed. At any given time, you can identify yourself, but this is your choice and at no point do you need to do this or will you be forced to provide your identity.

If you decide to disclose your identity, Triton Middle East will work to protect your identity and will outline and document who in the organization will know you submitted your report. We will also take all steps necessary to ensure you do not suffer any retaliation.

It is worth noting that Triton Middle East will make every endeavor possible to investigate your report, but in some cases, there are limitations of what can be achieved if the informant decides to remain anonymous

Investigation process

- Once a report is received from a whistle blower, it will be reported to Managing Director
- A case manager is assigned to the report to assess it and confirm its receipt.
- The case manager will do an initial assessment to confirm it is a valid report and request permission to investigate.
- The case manager will begin their investigation. This can include corresponding with the informant if there is a channel to do this.
- The case manager will investigate and update management and the informant Biweekly.
- Once the case manager has finalized their investigation and report, management and the informant will be updated.
- At this point, the case manager will hand everything over to management for any subsequent action to take place
- The informant can report directly to CEO if he is not satisfied with the investigation report.

Approved by,

CEO