M&F Trading Lda
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# Whistleblowing (Speak Up) Policy

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**Summary:**
MF-POL-005 · Version 1.0 · Issued October 2026 · M&F Trading, Lda1. PurposeM&F wants to hear about wrongdoing early so that it can be stopped and corrected. This policy explains how to raise a concern



## 1. Purpose

M&F wants to hear about wrongdoing early so that it can be stopped and corrected. This policy explains how to raise a concern, how it will be handled and how those who speak up are protected.

## 2. Scope

This policy may be used by Personnel, suppliers, customers, business partners and any other person with a concern about the conduct of M&F or of those acting for it.

## 3. What should be reported

Any suspected or actual:

- bribery, corruption, fraud or theft;
- breach of sanctions, export control or anti-money laundering laws;
- false accounting or falsification of documents;
- danger to health, safety or the environment;
- human rights abuse, forced labour or child labour;
- discrimination, harassment or bullying;
- breach of the Code of Conduct or any other Company policy;
- breach of law or regulation;
- deliberate concealment of any of the above.

A person does not need proof. A reasonable and honest belief is enough.

## 4. How to raise a concern

- To a supervisor or line manager, for matters that are not sensitive.

- By email to the Compliance Officer at compliance@mf.co.mz, or in person or in writing.
- To the Chief Executive Officer or any member of senior management.
- Where the concern involves the Compliance Officer or the Chief Executive Officer, to the Company's external legal adviser, whose details are available on request.

Concerns may be raised anonymously. Anonymous reports will be assessed, although investigation is easier where the reporter can be contacted.

## 5. Confidentiality

The identity of a person who raises a concern will be kept confidential and disclosed only to those who need to know in order to investigate, or where disclosure is required by law.

## 6. No retaliation

M&F will not tolerate retaliation of any kind against a person who raises a concern in good faith or who assists an investigation, even if the concern turns out to be mistaken. Retaliation includes dismissal, demotion, harassment, threats, termination of a contract and any other detriment. Retaliation is itself a serious breach of this policy.

A person who knowingly makes a false report is not protected by this policy.

## 7. How concerns are handled

- **Acknowledgement:** receipt will be acknowledged within five working days where the reporter can be contacted.
- **Assessment:** the Compliance Officer will assess the concern and decide whether an investigation is needed and who should conduct it.
- **Investigation:** investigations will be prompt, fair and independent of the persons concerned. External advisers may be used.
- **Outcome:** appropriate corrective and disciplinary action will be taken. The reporter will be told the outcome to the extent that confidentiality and the law allow.
- **Records:** a confidential record of each concern, the investigation and the outcome will be kept for at least ten years.

## 8. External reporting

Nothing in this policy prevents a person from reporting a suspected breach of law to a competent authority.

## 9. Responsibilities

The Chief Executive Officer has overall responsibility for this policy and for ensuring that it is applied.

The Company Compliance Officer (the "Compliance Officer") is responsible for day-to-day implementation, for giving guidance, for maintaining the records this policy requires and for reporting to the Chief Executive Officer.

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Managers are responsible for ensuring that their teams know and follow this policy.

All Personnel are responsible for reading, understanding and complying with this policy.

## 10. Breaches of this policy

A breach of this policy is a serious matter. It may result in disciplinary action under the Labour Law and the Company's Internal Work Regulation, up to and including dismissal, or in the termination of a contract with a third party. Where a breach may also be a criminal offence, M&F may report it to the competent authorities.

## 11. Review

This policy is reviewed at least once a year, and whenever there is a material change in the law or in the business of M&F. Changes are approved by the Chief Executive Officer.

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