WHISTLEBLOWER PROTECTION POLICY

JANUARY 2026

POLICY NUMBER: TMG-SEC-027
APPROVAL AUTHORITY: BOARD OF DIRECTORS

THE MAZI GROUP

1. PURPOSE

This Whistleblower Protection Policy establishes The Mazi Group's commitment to maintaining an ethical workplace where employees can report concerns without fear of retaliation. We encourage all employees to speak up about suspected wrongdoing and are committed to protecting those who do so in good faith. This policy applies across all brands: Mazi Beauty, Glam Switch, On The Go Mists, and Upvendo.

2. SCOPE

This policy applies to:

- All employees, officers, and directors
- Contractors, temporary workers, and interns
- Former employees
- All brands and business units
- All geographic locations

3. POLICY STATEMENT

The Mazi Group:

- Encourages reporting of suspected misconduct
- Prohibits retaliation against good-faith reporters
- Investigates reports promptly and thoroughly
- Protects reporter confidentiality to the extent possible
- Takes appropriate action on substantiated concerns

4. REPORTABLE CONCERNS

This policy covers reports of suspected:

- Fraud, theft, or embezzlement
- Financial irregularities or misrepresentation
- Bribery or corruption
- Violations of law or regulation
- Violations of company policy

- Harassment or discrimination
- Safety violations
- Environmental violations
- Data privacy breaches
- Conflicts of interest
- Retaliation against reporters
- Other unethical conduct

5. HOW TO REPORT

5.1 Reporting Channels

Reports can be made through:

- **Manager:** Your direct supervisor or any manager
- **Human Resources:** HR business partner or HR leadership
- **Legal Department:** Chief Legal Officer or legal team
- **Ethics Hotline:** Anonymous reporting available 24/7
- **Email:** compliance@mazigroup.us
- **Audit Committee:** For financial or accounting concerns

5.2 Ethics Hotline

- Available 24 hours a day, 7 days a week
- Anonymous reporting option
- Multiple languages available
- Operated by independent third party
- Web and phone options

5.3 What to Include

When reporting, provide as much detail as possible:

- Description of the concern
- Names of individuals involved
- Dates, times, and locations
- Any witnesses

- Supporting documentation
- How you became aware of the issue

6. CONFIDENTIALITY

- Reports are treated confidentially to the extent possible
- Information shared only on need-to-know basis
- Anonymous reports are accepted and investigated
- Reporter identity protected during investigation
- Complete confidentiality cannot be guaranteed if disclosure required by law

7. NON-RETALIATION

7.1 Protection

The Mazi Group strictly prohibits retaliation against anyone who:

- Reports a concern in good faith
- Participates in an investigation
- Refuses to participate in suspected wrongdoing
- Exercises rights under this policy

7.2 What Constitutes Retaliation

Retaliation includes but is not limited to:

- Termination or demotion
- Suspension or disciplinary action
- Reduction in pay or hours
- Negative performance reviews
- Transfer or reassignment
- Exclusion from meetings or opportunities
- Harassment or intimidation
- Threats
- Spreading rumors
- Any other adverse action

7.3 Reporting Retaliation

- Report suspected retaliation immediately
- Use any reporting channel
- Retaliation is a serious violation
- Those who retaliate face disciplinary action

8. GOOD FAITH REQUIREMENT

- Reports must be made in good faith
- Good faith means honest belief that misconduct occurred
- Reports need not be proven correct to be protected
- Knowingly false reports are not protected
- Making false reports may result in discipline

9. INVESTIGATION PROCESS

9.1 Investigation Principles

- All reports are taken seriously
- Investigations are prompt and thorough
- Investigations are fair and impartial
- Appropriate personnel conduct investigations
- Findings are documented

9.2 Investigation Steps

1. Receive and assess report
2. Determine appropriate investigator
3. Plan investigation
4. Gather evidence and interview witnesses
5. Analyze findings
6. Reach conclusions
7. Recommend actions
8. Implement corrective measures

9. Close investigation

9.3 Cooperation

- All employees must cooperate with investigations
- Provide truthful information
- Do not interfere with investigations
- Maintain confidentiality

10. OUTCOMES

10.1 Substantiated Concerns

If misconduct is confirmed:

- Appropriate disciplinary action taken
- Corrective measures implemented
- Process improvements made
- Regulatory reporting if required

10.2 Unsubstantiated Concerns

If misconduct is not confirmed:

- Investigation closed
- Good-faith reporter still protected
- No adverse action against reporter

10.3 Communication

- Reporter informed of investigation completion
- Specific outcomes may not be shared due to confidentiality
- General confirmation that matter was addressed

11. RECORD KEEPING

- Reports and investigations documented
- Records maintained securely
- Retention per records management policy

- Access limited to authorized personnel

12. EXTERNAL REPORTING

Nothing in this policy prevents reporting to:

- Government agencies
- Regulatory bodies
- Law enforcement
- Securities regulators (SEC, etc.)

Employees may be entitled to protections and rewards under laws such as the SEC whistleblower program.

13. EU WHISTLEBLOWER DIRECTIVE

For employees in the European Union:

- Internal reporting channels available
- External reporting to competent authorities permitted
- Protection against retaliation
- Confidentiality of identity protected
- Feedback provided within required timeframes
- Compliance with national implementing laws

14. ROLES AND RESPONSIBILITIES

14.1 All Employees

- Report suspected misconduct
- Cooperate with investigations
- Do not retaliate against reporters
- Maintain confidentiality

14.2 Managers

- Create environment where people feel safe to speak up
- Take reports seriously

- Escalate reports appropriately
- Do not investigate independently
- Protect reporters from retaliation

14.3 Legal and Compliance

- Oversee whistleblower program
- Manage investigations
- Ensure policy compliance
- Report to Audit Committee

14.4 Audit Committee

- Oversee financial and accounting complaints
- Receive reports on whistleblower matters
- Ensure program effectiveness

15. TRAINING

- All employees trained on this policy
- Training included in onboarding
- Annual refresher training
- Manager training on handling reports

16. RELATED POLICIES

This policy should be read in conjunction with:

- TMG-SEC-004: Anti-Corruption and Anti-Bribery Policy
- TMG-SEC-021: Code of Conduct and Business Ethics
- TMG-SEC-023: Anti-Harassment and Non-Discrimination Policy
- TMG-SEC-033: Financial Controls and Internal Audit Policy

17. POLICY REVIEW

This policy shall be:

- Reviewed annually by Legal and Compliance

- Updated for legal changes
- Approved by the Board of Directors
- Communicated to all employees

18. DEFINITIONS

- **Whistleblower:** A person who reports suspected misconduct.
- **Good Faith:** Honest belief that the information reported is true.
- **Retaliation:** Adverse action taken against someone for reporting concerns or participating in an investigation.
- **Misconduct:** Violation of law, regulation, or company policy.

To report concerns:
Compliance Department
compliance@mazigroup.us
Legal Department