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Name:	Whistle-blowing Policy
Level:	Stanbic IBTC Asset Management Limited
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Approved by:	Board Risk Management Committee
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Classification

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1 Policy Statement

1.1 Stanbic IBTC Asset Management Limited is committed to establishing a culture of integrity, transparency, openness and compliance, in accordance with the values and Code of Ethics adopted by the Company.

1.2 The Whistleblowing Policy provides for employees, management, directors and other stakeholders to report any attempted, suspected or actual financial crime and unlawful, irregular or unethical behaviour that they come across in the Company, by providing a framework for employees and other stakeholders to report their concerns internally at the Company or externally. Whistleblowing is intended for employees, management, directors of the Company and other stakeholders.

1.3 The purpose of this Policy is to:

i) Ensure that an ethical culture is maintained within the Company.

ii) Ensure that all employees, management, directors of the Company and other stakeholder understand what Whistleblowing is.

iii) Provide the principles that need to be followed in relation to Whistle-blowing.

iv) Provide a framework for employees, management, directors and other stakeholders to report their concerns which may arise in the Company.

v) Encourage Whistle-blowers to raise concerns in the Company and make reports, in good faith, and in a transparent manner, without fear of victimisation or prejudice.

vi) Provide a framework for non-employees or external parties to the Company, to make Whistleblowing disclosures.

vii) Set out the responsibilities in upholding the Principles relating to Whistleblowing.

vii) Set out the consequences of not complying with the Whistle-blowing Principles.

2 Applicability

2.1 This Policy applies to all employees, management, directors of the Company and other stakeholders as defined in Section 9: Definitions.

2.2 This Policy also applies to Whistleblowing disclosures made by non-employees or external parties to the Company.

2.3 This Policy reflects the company's minimum requirements and may be supplemented in a local jurisdictional or business policy or procedure.

3 Policy

Who is a Whistleblower

A whistleblower in the context of this policy is a person (employee/external party) reporting/disclosing information pertaining to activities that are deemed illegal, illicit, immoral, unethical, fraudulent, or that involves bribery, corruption, financial irregularities, any form of harassment or malpractice that he/she based on reasonable grounds believes may impact the trust and integrity of the company.

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4 Minimum requirements to comply with this Policy

Our principles in relation to Whistle-blowing are as follows:

4.1 Who can make a Whistleblowing report?

i) **Principle 1**: Employees, management, directors of the Company and other stakeholders may make a Whistleblowing report in terms of this Policy.

4.2 Information that should be reported:

i) **Principle 2**: Where a whistle blower discovers information, which he in good faith believes shows wrongdoing by the Company or employees of the Company, the whistle blower may report this in terms of this Policy.

ii) **Principle 3**: Whistle blowers may report any suspected, attempted or actual financial crime and/or unlawful, irregular or unethical behaviour in the Company, including any breach of this Policy.

iii) **Principle 4:** Any employee of the Company or other stakeholder who has reason to believe that information regarding the behaviour of the Company or any employee of the Company shows one or more of the following, may report this information in line with this Policy.

- Employer or employee behaviour which is not in line with the Company's values, its code of ethics, and policies and/or procedures, as they may be published and communicated from time to time;
- Unethical behaviour;
- Criminal behaviour;
- Failure to comply with the law;
- Injustice;
- Fraud, embezzlement, theft, bribery and corruption;
- Danger to the health and safety of any individual;
- Environmental damage;
- Unfair discrimination; harassment, victimisation, bullying or sexual misconduct.
- Abuse of power or authority;
- Misrepresentation of information.
- Mismanagement;
- Maladministration;
- Abuse of company or client resources and assets; and
- Deliberately hiding information about any of the above.

iv) **Principle 5:** The whistleblower is not expected to prove the truth of an allegation but will need to show that there are sufficient grounds for concern.

4.3 **Information that should not be reported in terms of this Policy:**

i) **Principle 6**: Information relating to customer issues, petty disputes, employee grievances, false or misleading reports, matters already under disciplinary enquiry and matters already referred to dispute resolution, arbitration or to the courts, should not be reported in terms of this Policy.

4.4 **Prohibition against harassment, victimisation or prejudice:**

i) **Principle 7**: The Company prohibits actual or threatened harassment, victimisation or prejudice of any whistleblower making a protected disclosure / report in terms of this Policy.

ii) **Principle 8**: No whistle blower shall be disadvantaged when reporting legitimate concerns in good faith, or on the basis of a reasonable belief.

4.5 **Protection of Whistle blower:**

i) **Principle 9:** The Company will protect a whistle blower who makes a Whistleblowing report, from being victimised or suffering prejudice for making the report, provided that:

- the whistle blower makes the report in good faith;
- it is reasonable for the whistle blower to make the report;
- the report is made on the basis of a reasonable belief that it is true;
- the report is not made for personal gain, except if any reward is payable in terms of any law;
- the whistle blower is able to be identified and the report is not made anonymously[1]; and
- The report is made in accordance with this Policy.

ii) **Principle 10: Protected Disclosure**

For a Whistleblower's report to be a protected disclosure, the following conditions must apply:

- the disclosure is made in good faith;
- the disclosure is made based on a reasonable belief that it is true;
- If it relates to environmental damage, that the environment has been, is being or is likely to be damaged;
- That a person has failed, is failing or is likely to fail to comply with any legal obligation to which that person is subject.
- that a failure of justice has occurred, is occurring or is likely to occur;
- that a wrongdoing, unethical or improper practice was seen or being observed;
- that the health or safety of an individual has been, is being or is likely to be endangered;

[1] The simple reason for the Company not protecting Whistleblowers who remain anonymous is that the Company cannot protect "faceless" persons.

- unfair discrimination as contemplated in the Promotion of Equality and Prevention of Unfair Discrimination Act (or other similar legislation in a specific country if applicable)

- the disclosure is not made for personal gain, except if any reward is payable in terms of any law.

4.6 **Anonymous reporting:**

i) **Principle 11**: The Company allows for anonymous Whistle-blowing reporting of wrongdoing in the Company, however the Company cannot protect Whistleblowers who decide to remain anonymous, from victimisation or prejudice in the workplace[2]. The following factors would be considered before investigating anonymous reports:

- The Seriousness of the issues;
- The significance and credibility of the concern; and
- The possibility of confirming the allegation

4.7 **Malicious reporting:**

i) **Principle 12**: The Company is not obliged to protect an employee against prejudice in the workplace, who in bad faith or maliciously makes a false report, or who unfairly or unjustly dishonours another. Appropriate disciplinary action will be taken, in these cases.

4.8 **Prohibition against interfacing with on-air media, social media or print media:**

i) **Principle 13**: In the instance that the Whistle blower is an employee of Stanbic IBTC Asset Management Limited, such employee is prohibited from making public the substance contained in the whistle blowing complaint to the On-Air Media (Radio and TV Stations) or Print Media (Newspapers) before reporting such complaints. In addition, employees MUST not comment, post, react either anonymously or in proxy on any social media platform to any matter relating to the whistle blowing complaint and/or any whistle blowing matter that is actively being investigated and is to the knowledge of such employee.

Employees are encouraged by this policy to only report matters covered by this policy internally through the whistle blowing channels and not to any external party or the media

4.9 **Hiding involvement in criminal activities or unethical behaviour:**

i) **Principle 14**: Employees who hide or conceal their own involvement in criminal activities and/or their own unethical behaviour will not be protected from criminal prosecution, disciplinary action or civil liability.

4.10 **Protecting the Whistle-blower's identity:**

i) **Principle 15**: The Company will protect the Whistle-blower's identity, if the report is made in line with this Policy.

4.11 **Confidentiality:**

i) **Principle 16:** The Company will treat Whistle-blowing reports that are made via internal Whistle-blowing channels, confidentially, except where information regarding the report needs to be given out to progress an investigation, or by law.

[2] The simple reason for the Company not protecting Whistleblowers who remain anonymous is that the Company cannot protect "faceless" persons.

4.12 **Reporting channels provided for in this Policy:**

i) **Principle 17:** The whistle-blower must make Whistle-blowing reports using the reporting channels provided for in the Policy.

ii) Internal Whistle-blowing channels:

- Whistle-blowing reports can be made internally to the Company, through any of the following Whistle-blowing channels:
  - Directly to your responsible line manager;
    - Head: Group Forensic Services (GFS);
  - Head, Internal Control
  - The Deloitte Tip-Offs Anonymous Whistle-blowing line/ E-mail
    - 02014227777 , 0201271 7739, +27 31571 5459
    - whistleblowingline@tip-offs.com

- Reports received via the above internal Whistleblowing channels must be routed to Group Forensic Services (GFS) or Head Internal Control, where these reports will be analysed and screened for appropriate action. Internal Audit receives the analysed report from the GFS and assigns fraud cases to IFR, while process and conduct cases are referred to Internal Control team for investigation.

iii) External Whistle-blowing Channels:

- Whistle blowers may also make Whistle-blowing reports to persons or bodies other than internally to the Company (e.g. the Securities and Exchange Commission –0209462 1168)
- The reports may however only be protected by the law if they are made in good faith and the employee believes that the information is substantially true.
  - A legal representative, provided it is made with the object of and while obtaining legal advice.
  - The Auditor General;
  - Public Protector, or
  - A prescribed person/body who the employee reasonably believes would usually deal with these matters.

iv) Other Whistle-blowing Channels

- Whistle blower may also make Whistle-blowing reports, to a person internal to the Company or to an external party, other than those included in the internal and external Whistle-blowing channels above, where the whistle blower:
  - has a reason to believe that they will suffer victimisation or prejudice if they make the report/ disclosure to the Company using the internal Whistle-blowing channels above; OR
  - has a reason to believe that evidence will be hidden or destroyed if they make the report/ disclosure to the Company; OR

- ❖ previously made a report of the same information internally or externally and no action was taken within a reasonable period; OR
- ❖ believes that the behaviour is of an exceptionally serious nature.

 These Whistle-blowing reports may be protected by the laws, however the whistle blower should obtain legal advice on the requirements when using these other whistle-blowing channels and processes.

4.13 Obligations on the Company regarding feedback on the Whistle-blowing report

i.) Principle 18: The Company is not obliged to provide feedback to a whistle-blower who has made a disclosure in terms of this Policy, in relation to the whistle-blowing report or disclosure made or on any investigation which has been undertaken in relation to the report or disclosure, but the Company may confirm receipt and resolution of the matter on request.

Based on its mandate, Internal Control will assess whether to investigate the matter or not, or whether to refer the disclosure to another person, Business Unit or body to assess. Where additional information is required, Internal Control will request this directly from the whistleblower where the identity is known, or through the Whistleblowing Hotline if anonymous.

Internal Control will acknowledge to the whistleblowing service provider, the receipt of disclosures made via the Whistleblowing Hotline in writing, informing the service provider of the decision to investigate the matter, and where possible, the timeframe within which the investigation will be completed, or updates will be provided.

Investigations conducted by Internal Control are conducted in an independent and objective manner and all reasonable steps are taken to ensure that all aspects of the matter and associated evidence are adequately examined.

At the conclusion of the investigation, feedback, such as whether the allegation/s is/are founded or unfounded, will be provided. If the disclosure was made through the Whistleblowing Hotline, whistleblowers must contact the Whistleblowing Hotline and provide the unique reference number received at the time of making a disclosure and request feedback and or provide additional information.

Where a decision has been made not to investigate a case, which may be based on insufficient information provided by the whistleblower, the reasons for such decision will be disclosed either directly to a whistleblower where the identity is known or through the Whistleblowing Hotline, which is anonymous.

In the event that the company is unable to decide whether to investigate the matter or not due to insufficient information, the company will inform the whistleblower within 21 days after the protected disclosure has been made, in writing if known or through the Whistleblowing Hotline where the identity is anonymous. The whistleblower will be awarded 21 days to enhance the information provided, where after a final decision will be made.

In the instance that the whistle blowing complaint is of criminal nature and/or the complaint is a high-risk incident, such complaint may be referred to the Law Enforcement Agencies (Nigeria Police Force - NPF, Economic and Financial Crimes Commission – EFCC etc.) for investigation and/or appropriate actions

4.14 Advice regarding the Policy

i) **Principle 19**: If an employee needs advice on what to do, if faced with a concern or has any other queries relating to this Policy, it should be raised with the employee's line manager, or with the Head, Internal Control.

4.15 **Breaches**

i) **Principle 20** Breaches of this policy must be reported to line management and Internal Control.

4.16 **Interpretation**

i) **Principle 21**: If any aspect of this policy can be interpreted as having more than one meaning, then the meaning that best promotes the purpose of this policy shall prevail as decided by the policy owner.

4.17 **Recordkeeping**

i) **Principle 22**: All records relating to disclosures and actual or potential non-compliance with this policy must be kept for at least five years or in accordance with the time period prescribed for recordkeeping by jurisdictional regulatory requirements, whichever is the later.

5 Exceptions

Deviation from the requirements of this policy is subject to approval by a Director. A request for exception, deviation or exemption of any of the requirements here-in must be submitted for decision to a Director by the Head, Internal Control on behalf of the respective departments. All exceptions to this policy must be formally recorded, tracked, reviewed and communicated to relevant stakeholders. Any exceptions must have a clear action plan and due date for the exception to be closed.

6 Roles and Responsibilities

6.1 Employees

i) All employees are encouraged to and may report wrongdoing by their employer or employees of the Company which they are aware of, or believe has taken place in the workplace.

ii) All employees are responsible for understanding, complying with and applying this Policy, to the extent that this may relate to their role in the organisation, and employees may ask their Line Manager or the Head, Internal Control for clarity about the content of this Policy.

iii) All employees must not make allegations which he /she knows are false or make a report in bad faith or maliciously.

iv) All employees must report breaches, including perceived or potential breaches, of this policy and any associated procedures to Internal Control.

6.2 Executive and Line Management

i) must ensure that all new and current employees are informed of the Company's Policy and expectations in relation to Whistle-blowing.

ii) must forward any Whistle-blowing complaints referred to them, to the Head, Internal Control securely and within a reasonable period.

iii) must assist any employee reporting to him or her who requires advice on what to do, if faced with a concern, or has any other queries relating to this Policy.

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iv) must monitor and ensure compliance with this Policy within their area of responsibility.

v) must institute and maintain measures and controls to ensure adherence to this policy.

vi) must ensure that no employee may be subjected to any occupational detriment on account, or partly on account, of having made a protected disclosure.

vii) must take reasonable steps to bring the internal procedures to the attention of every employee and external party. Any employee or external party who, in accordance with a procedure authorised by his or her employer, makes a disclosure to a person other than his or her employer, is deemed, for the purposes of the Act, to be making the disclosure to his or her employer.

viii) is responsible and accountable for the implementation of the requirements of this policy; and

ix) must monitor adherence to this policy

6.3 Recipients of reports

i) All persons receiving Whistle-blowing reports in term of this Policy must ensure that these are reported to the Head, GFS or Internal Control where the reports will be analysed, investigated and appropriately actioned, and feedback given after the investigation is complete.

ii) All recipients of reports must protect the identity of whistle-blowers at all times and treat reports with the utmost confidentiality.

6.4 Internal Control

Internal Control is responsible for:

i) designing, implementing, maintaining and periodically updating the policy, directives, standards and guidance notes for Whistle-blowing, where applicable.

ii) ensuring that all Whistle-blowing reports made in terms of this Policy, are referred to the Head, GIFR or IFR for investigations and appropriate actions.

iii) reporting to the Executive Committee or other Committees as appropriate any material matters and any non-compliance with this Policy and related consequence management.

iv) providing management information to key stakeholders regarding Whistle-blowing matters, on request.

v) deciding on requests for exceptions to this Policy.

6.5 People and Culture Employee Relations/ Process and Conduct Investigation Team must:

i) assess and analyse all disclosures referred to them by Internal Control and or Line Management and take the appropriate action.

6.6 Executive Committee (ExCo) and Board Risk Management Committee (BRMC)

i) The Executive Committee (ExCo) must support while the Board Risk Management Committee (BRMC) approves this Policy.

ii) BRMC reviews reports of material matters and any non-compliance with this Policy and related consequence management.

7 Related policies and procedures

7.1 This Policy should be read together with the following documents:

i) Guidance Note: Whistle-blowing Policy – currently an annexure in this policy.

ii) Anti-Bribery and Corruption Policy.

iii) Anti-Bribery and Corruption Management System (ABMS), once implemented.

iv) Anti-Financial Crime Policy.

v) Stanbic IBTC Code of Ethics.

vi) Group Reference Guide.

vii) Disciplinary process and sanction policy.

viii) Records Management Policy

ix) Harassment Policy

x) Data Privacy Policy

8 Disciplinary Action

8.1 Disciplinary action may be taken against any employees who do not comply with this Policy. Where such non-compliance constitutes gross misconduct it may result in dismissal.

8.2 In addition, an employee may be held personally liable for civil or criminal penalties which include fines, payment of damages and/or imprisonment.

9 Definitions

The following defined terms shall apply to this Policy:

Employee:	means: • officers; • permanent employees; • temporary employees or secondees; • contractors; • non-permanent staff; and • workers regardless of their specific job responsibilities, department or location.
Client	• A person or persons or institution that holds or maintains a relationship with the company or expresses or indicates an intention to do so (includes a consultant, broker, vendor or other service providers).

External party	Any individual other than an employee of the company who wants to report matters of unethical behaviour about the company and its employees.
Protected Disclosure	Disclosure in line with the Act and this policy of information regarding any conduct of the company, or its employees made by any employee who has reason to believe that the information concerned shows or tends to show one or more of the reportable issues as listed above in section 3 herein.
Whistleblower	Any person who discovers and reports information which they in good faith believe shows wrongdoing by the company or its employees and reports it in line with the whistleblowing policy.
Victimisation or prejudice:	means: • Disciplinary action; • Dismissal, suspension, demotion, harassment or intimidation; • Being transferred against one's will; • Refusal of a request for transfer or promotion; • Conditions of employment or retirement altered to the disadvantage of an Employee; • Refusal of a reference or providing an adverse reference; • Being denied an appointment to any employment, profession or office; • Being negatively affected in terms of employment opportunities or work security; • Being threatened with any of the above.
Other Stakeholders	Means: • Contractors • Shareholders • Job applicants • General public

10 Policy Administration

Contact Person:

Title:	Head, Internal Control
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Key Words:	Whistle Blowing

11 Revision History				
***Version no.**	**Purpose of revision: *[Regulatory development / annual review]***	**Review date:**	**Effective date:**	**Summary of key revision points:**
V1	Annual review	25 April 2013	25 April 2013	
V2	Annual review	June 2017	August 2017	Inclusion of reporting hotlines for KPMG
V3	Biennial review	December 2019	February 2020	
V4	Biennial review	February 2022	February 2022	Change of Whistle-blowing service provider to Deloitte Tip-Offs Anonymous. Change of policy owner to Internal Control
V5	Biennial review	February 2024	February 2024	An update to the following has been affected: • definition of whistleblower • whistleblowing reporting channels • name changes to structures, e.g. replacement of GIFR with GFS • definitions of whistleblower and protection of whistleblower enhanced
V6	Biennial review	August 2025	August 2025	An update to the following has been affected: • Prohibition against interfacing with on-air media, social media or print media whistleblowing reporting channels • Internal Whistle-blowing channels • External Whistle-blowing Channels

V7	Regulatory Development	December 2025	December 2025	Changes in the process of handling whistle blowing process and policy administrator

**ONLY whole numbers will be accepted as final versions for publishing purposes (e.g. from v0.1 – v0.9 are still drafts, v1 is considered a final version for publishing).*

12 Annexure: Guidance Note - Frequently asked questions

12.1 Who can make a whistle-blowing report?

i) Employees, management, directors of the Company and other stakeholders may make a Whistle-blowing report in terms of the Whistle-blowing Policy.

ii) Concerns and reports must be raised in good faith, not in a malicious way and not for personal gain. The whistle blower must reasonably believe that the information reported, and any allegations contained in the Whistle-blowing report, are substantially true and should provide all available supporting information and documentation. If you are not an employee or are a party external to the Company, you are not restricted in the content of your report, provided that it relates to the Company.

12.2 When to make a report or disclosure?

i) Whistle blowers are encouraged to raise and report concerns at the earliest possible stage.

12.3 What can be reported using the Whistle-blowing Policy?

i) You can report any suspected, attempted or actual wrongdoing in the workplace. This may involve your employer or an employee of the Company.

ii) Using the Whistle-blowing process, you can report valid concerns including but not limited to:

- Employer or employee behaviour which is not in line with or inconsistent with the Company's values, its code of ethics, and/or its policies and procedures.
- Fraud, embezzlement, theft, bribery and corruption;
- Unethical behaviour;
- Criminal behaviour;
- Failure to comply with the law;
- Injustice;
- Danger to the health and safety of an individual;
- Damage to the environment;
- Unfair discrimination; harassment, victimisation, bullying or sexual misconduct.
- Environmental damage
- Abuse of Company or client resources or assets;
- Abuse of power or authority;
- Misrepresentation of information;
- Mismanagement;
- Maladministration; and
- Abuse of human rights,
- Deliberately hiding information about any of the above.

12.4 Making a choice between “anonymous” Whistle-blowing or providing your identity

i) As a Whistle-blower, you must make a choice between making an “anonymous” Whistleblowing report and revealing your identity.

12.5 What is anonymous whistle-blowing?

i) As a Whistle-blower, you may choose not to reveal your identity.

ii) The Company has established a Whistle-blowing line, which employees may use to report concerns in the workplace. The Whistle-blowing line is managed by Deloitte Tip-Offs Anonymous, an independent third party big four audit firm. The systems of Deloitte Tip-Offs Anonymous are set up in such a way that electronic reporting is *non-traceable* through devices such as caller ID. Deloitte Tip-Offs Anonymous is not permitted to give away the identity of an anonymous caller to the Company, even if they do become aware of the caller’s identity.

12.6 How can I help with an investigation, and still remain anonymous?

i) If the call is made anonymously, it limits the ability of the Investigator to obtain further information relating to the allegation and makes it difficult to clarify the concerns raised. Where there is insufficient information provided, and the Investigator is unsure of the concerns, some cases need to be closed.

ii) To assist in investigations, where you still wish to remain anonymous, you should always call the Whistle-blowing line back after 14 days. Investigators will often leave further questions that they need answered with the Deloitte Tip-Offs Anonymous Whistle-blowing line staff. You will be able to assist in the investigation further by answering the questions, and still remain anonymous.

iii) If the Whistle-blowing report is made anonymously, the Company will not be able to protect the Whistle-blower from victimisation or suffering prejudice for the simple reason that the Company cannot protect an unidentified or “faceless” person. It must be noted that anonymous whistleblowers are not known to the Company and protecting them from victimisation or prejudice in the workplace will be possible once they report using the protected structures.

12.7 What protection do I have if I reveal my identity?

i) As a Whistle-blower you may choose to provide your identity when making a Whistle-blowing report. If you provide your identity, the Company will respect and protect your identity, and confirms that it will not reveal your identity. The only exception to this, is if the Company is obliged to reveal confidential information relating to you as a Whistle-blower by law, but the Company will always inform you, before it reveals your identity.

ii) The Company will protect an employee who makes a Whistle-blowing report, from being victimised or suffering prejudice in the workplace, if the identity of the Whistle-blower is made available.

12.8 Is my report confidential?

i) Whether you decide to make an anonymous Whistle-blowing report or you decide to provide your identity, your Whistle-blowing report, will always be treated confidentially. The Company wishes to assure the safety of Whistle-blowers and therefore undertakes to treat all Whistle-

blowing reports as confidential. An exception to this is where the Company is obliged to reveal confidential information relating to the Whistle-blowing report, by law, or where it is necessary to progress and investigation.

ii) Importantly, the Company's undertaking of confidentiality over the Whistle-blowing report can only be completely effective if the Whistle-blower also maintains confidentiality.

12.9 How to raise a Whistle-blowing complaint?

i) You may make the Whistle-blowing report by using the internal, external or other Whistleblowing channels in the Whistle-blowing Policy.

ii) You may make a Whistle-blowing report by providing your identity or an anonymous Whistleblowing report.

iii) You should provide as much information as soon as possible, such as names, dates, places, and references and as much supporting documentary evidence as possible, when making your Whistle-blowing report.

iv) If you make your report through any of the internal Whistle-blowing channels, including the Deloitte Tip-Offs Anonymous Whistle-blowing line, your report will be routed to the Head, Internal Control, for investigation and/or appropriate action.

12.10 Internal reporting through the Deloitte Tip-Offs Anonymous Whistle-blowing line

i) You may contact the Deloitte Tip-Offs Anonymous Whistle-blowing line to make a Whistleblowing report. You may make a confidential report or remain anonymous when making your report.

ii) If you make an anonymous report to the Deloitte Tip-Offs Anonymous Whistleblowing line, you are still encouraged to leave your name and contact details with Deloitte Tip-Offs Anonymous, so that Deloitte Tip-Offs Anonymous can contact you regarding the investigation and so that feedback can be given. Deloitte Tip-Offs Anonymous will keep your name and contact details confidential.

iii) An operator will answer your call and record the details of the concern you wish to report. During this conversation the operator will request as much information as possible to ensure that the investigators have enough information to investigate the report.

iv) Operators of the Whistle-blowing line will submit a report to the GFS Unit or Internal Control Unit who are responsible for receiving and actioning all reports made internally. If you made an anonymous report but left your name and contact details with Deloitte Tip-Offs Anonymous, they will not provide your name and contact details to the GFS Unit or the Internal Control Unit.

v) Callers may re-contact the Whistle-blowing line to request a feedback report from the investigation team and the investigation team may request further information from the caller by leaving their request for information with the Whistle-blowing line operator.

vi) The Company is not obliged to provide feedback to a Whistle-blower who has made a disclosure in terms of this Policy, in relation to any investigation which has been undertaken in relation to the Whistleblowing report or disclosure, but the Company may confirm receipt and resolution of the matter, on request.

12.11 How to decide if it is reasonable to make a Whistle-blowing report?

i) When deciding if making the Whistle-blowing report is reasonable, you should consider the following:

- The seriousness of the behaviour complained of.
- Whether the behaviour complained of is continuing or likely to occur in the future.
- Whether the Whistle-blowing report is in breach of a duty of confidentiality of the Company towards any other person.
- Whether you as the Whistle-blower have complied with the procedure set out by the Company in making the Whistle-blowing report or disclosure.
- Whether the employer may have taken action already as a result of a previous Whistleblowing report or disclosure made.
- The interests of the public.

12.12 False or malicious Whistle-blowing reports

i) Any person making a Whistle-blowing report must not make allegations which are false or make a report in bad faith or maliciously.

ii) The Company is not obliged to protect any employee from prejudice in the workplace, who makes a Whistle-blowing report, knowing that the information provided is untrue. In these cases, disciplinary action may be taken against the person concerned.

12.13 What to do if you suffer victimisation or prejudice for making a protected Whistleblowing report?

i) If an employee suffers victimisation or prejudice for making a protected Whistle-blowing report, the employee may:

- follow the normal grievance procedure to address the issue.
- be transferred, at his/her request, to another post or position in the same division or another division of the Company, if reasonably possible and practical. The terms and conditions of employment for the transfer may not be less favourable than before the transfer, without the Employee's consent. Reasonable grounds for transfer will be determined, taking into account the circumstances and merits of each request.
- The whistleblower should report any victimisation experienced, on account of making a disclosure under the Act to the Head: Internal Control. The whistleblowing hotline, administered and controlled by the company's external service provider, can also be used for this purpose.
- Internal Control will assess the merits of the report and may escalate to the Head of People and Culture (P&C), Process and Conduct Investigation team and/or the Business Unit Head to assess the matter. Anyone found to be engaging in the practice of retaliation may be subject to disciplinary action which may result in a dismissal.
- Internal Control will have oversight of the assessments of matters referred to P&C, Process and Conduct Investigation and/or the Business Unit and ensure that the matter is dealt with and feedback on the outcome of the matter is provided to the whistleblower through the whistleblowing hotline.
- approach any court having jurisdiction, or follow any other process allowed by law.

12.14 Disciplinary enquiries following Whistle-blowing reports

i) After an investigation, if it is recommended that a disciplinary enquiry will be necessary; the disciplinary enquiry will be initiated by GIFR or IFR.

ii) IFR will represent the Company (as its appointed representative) and is responsible for amongst other matters:

- Formulating and agreeing charges, together with Employee Relations and Human Capital;
- Selecting and presenting witnesses at the disciplinary enquiry;
- Leading and presenting evidence at the enquiry; and
- Presenting argument relating to an appropriate sanction.

12.15 Will the person be treated differently when raising a concern?

i) If you have raised a suspicion or concern in good faith, the answer is "no".

12.16 What if the person making the Whistle-blowing report is not entirely sure of the facts, but is only suspicious?

i) It is important for whistle-blowers to raise any reasonable suspicion that they may have, of wrongdoing in the workplace, so that this can be looked into, provided that the Whistleblowing report is made in good faith.

12.17 What about a personal work-related complaint or concern?

i) If you have a personal complaint or a concern that affects you as an individual, e.g. harassment, this should be raised using the Group Reference Guide (GRG) procedures. Advice is available from your Business Unit Human Capital representative.

12.18 Will the person raising a concern get into trouble?

i) If an employee has raised his/her concerns as is set out in the Whistle-blowing Policy or this Guidance Note, the employee will not be considered a troublemaker nor a disloyal employee for raising these concerns. If an employee is himself or herself involved in the wrongdoing, the Company will try to ensure that the employee does not suffer prejudice from other colleagues for having spoken out. However, the employee who was involved in the wrongdoing would still have to answer for his or her actions and could not expect immunity from disciplinary or criminal proceedings. The fact that the employee disclosed his or her involvement in any wrongdoing, would likely be taken into account in determining the course of action (if any) that will be taken with respect to the employee.

12.19 What if the concerns involve a client of the Company?

i) Clients are owed a duty of confidentiality under the Company policies and applicable regulations. It is important to respect this. If an employee genuinely believes that a client is involved in any wrongdoing, the employee must bring this matter to the attention of his or her line manager or Risk Manager. This will ensure that the Company can deal with the matter lawfully and correctly.