



Whistleblowing Procedure

Declaration

The company known as _____
Is committed to returning dividends for its shareholders and consequently recognises, without inculpatory admission of malfeasance, that this pursuit may give rise to incidents or practices that could be perceived by some employees as prejudiced, morally questionable or, illegal. We therefore accept that “Whistleblowing” as an act exists *in potentia* irrespective of any legitimacy in the instance thereof.

Whistleblowing shall be defined as the act of reporting concerns about a person, persons or department possibly engaging in an activity or activities that have the potential to be conceivably observed to be illicit, illegal or otherwise detrimental to shareholder or public interests.

Whistle-blower or Whistle-blowers shall be defined as the informant or informants in the hypothetical instance of the act of whistleblowing occurring.

Reporting

Employees shall be instructed to report concerns internally. Informant’s shall report any and all concerns to their immediate superiors. Should the concerns be related to the informant’s immediate superiors the informant’s concerns should be reported to the Human Resources department. Should the informant’s concerns be related to the Human Resources department the informant’s concerns should be reported to their immediate superiors. Should the informant’s concerns be related to immediate superiors in the Human Resources department the informant’s concerns should be reported to the Human Resources department.

In the event that a case of whistleblowing occurs all reported concerns shall be processed through the Human Resources department only. The investigating department shall be defined at the discretion of the processing department. The investigating department shall follow the guidelines outlined below.

Investigative guideline

- Knowledge. What is the concern and can it be evidenced? How many people know?
- Intent. What does the informant want? Can the matter be settled informally? What is the information worth?
- Liabilities. What is the risk? Would exposure result in authority interest or litigation? Are shareholder interests in jeopardy? Do any documents need redacting or shredding?
- Leverage. Can the informant afford legal representation? If not, is it viable to start civil litigation against them? Do they have a disciplinary history that can be used against them? Does the informant have a physical or mental health impairment that could be exploited to erode their motivation? Do they have personal debt or court judgements against them? Do they have family?
- Isolation. As much as possible ensure that the informant or informants are separated from all opportunity to discuss any issues with colleagues, other departments or other third-party individuals or groups.
- Termination. Can the informant’s contract be ended? Can anything be done to make them leave of their own volition?

Information about the concerns and any subsequent investigation shall be kept restricted to the processing department and the defined investigating department. Failure to comply will be considered misconduct.

Additional guidelines

1. The number and identity of investigating parties shall be chosen as deemed appropriate by and at the discretion of the investigating department, as defined at the discretion of and by the processing department.
2. Once the investigation has been judged by the processing department to have progressed sufficiently as to allow for conclusion of the investigation, the results will be evaluated by the processing department at the discretion of the processing department.
3. In the event that evidence of wrongdoing is found, the company disciplinary procedure shall be followed against the relevant parties at the discretion of the processing department.
4. In the event that no evidence of wrongdoing is found, the company disciplinary procedure shall be followed against the relevant parties at the discretion of the processing department.
5. In the event that the disciplinary procedure is not followed by the processing department, the company disciplinary procedure shall be followed against the relevant parties at the discretion of the processing department.
6. External agencies or authorities shall not at any point be contacted or interacted with during the investigation, evaluation, or disciplinary processes.
7. The current version of this policy shall supersede any previous versions of this policy.
8. All employees of the company are responsible for seeking out, observing and complying with the current version of this policy. Failure to be aware of, comply with, or agree with the current version of this policy shall be considered misconduct and could lead to disciplinary action including dismissal.

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