

## Whistleblower policy

### In a nutshell...

In order to promote a culture of openness and honesty, we've created this whistleblower policy to provide staff (and external parties) with the necessary information to report fraud and unethical behaviour within our kingdom. If you know of any instances of fraud, lying, abuse, harassment etc. you can call us on 0800 00 40 10.

### Definitions

Throughout this document, unless stated otherwise, the words below have the meanings assigned to them herein, as the case may be (and related expressions will have these meanings):

#### **The Act**

The Protected Disclosures Act No. 26 of 2000.

#### **Policy**

This whistleblower policy of King Price.

#### **Fraud and corruption**

Includes, but isn't limited to:

- Fraud, for example, the unlawful and intentional making of a misrepresentation which causes actual prejudice, or which is potentially prejudicial to another.
- Theft, for example, the unlawful and intentional appropriation of movable corporeal property, including information in electronic format, which belongs to and is in the possession of another; which belongs to another but is the perpetrator's own possession; or which belongs to the perpetrator but is in the possession of another person who has a right to possess it and where such right legally prevails against the perpetrator's own right of possession.
- Offences in respect of corrupt activities as defined in the Prevention and Combating of Corrupt Activities Act No. 12 of 2004.

### Introduction

King Price acknowledges that:

- Unethical conduct, fraud and corruption is detrimental to good, effective, accountable and transparent governance and can potentially cause social/reputational damage.
- There's a need for procedures in terms of which employees and external parties may, without fear of reprisal, disclose information relating to suspected or alleged unethical conduct, fraud and corruption.
- Every employer/employee has a responsibility to disclose unethical conduct, fraud and corruption in the workplace.
- They're responsible for taking all the necessary steps to ensure that employees (and external parties who disclose such information) are protected from any reprisal that may result from the disclosure.

### Objective

In order to comply with the Act, King Price will:

- Strive to create a culture which facilitates the disclosure of information by employees and other parties relating to unethical conduct, fraud and corruption in the workplace in a responsible manner by providing clear guidelines for the disclosure of such information as well as protection against reprisal which may result from the disclosure.
- Promote the eradication of unethical conduct, fraud and corruption within King Price.

- Ensure that this policy encourages and enables employees and external parties to raise concerns within King Price, rather than merely ignoring a problem or blowing the whistle through inappropriate channels. It also aims to:
  - Provide a means for employees, students and external parties to raise concerns and receive feedback on any actions taken.
  - Reassure employees, students and external parties that they'll be protected from reprisal or victimisation for whistleblowing.

## Harassment or victimisation

- The decision to report a concern may be difficult due to fear of reprisal from those responsible for the reported incident. King Price won't tolerate harassment or victimisation of any kind and will take appropriate action to protect its employees and external parties when they raise a concern.
- King Price will, at all times, take all reasonable steps to protect a reporting individual's identity if such individual doesn't want their identity to be disclosed. However, it should be noted that an investigation and remedial action processes may inadvertently identify the source of the complaint and that a statement by the reporting individual concerned may be required as part of the evidence.
- No person may be compelled to give evidence in terms of this policy.
- Where an employee is already the subject of disciplinary action, the employee's whistleblowing won't halt such disciplinary action, although the facts pertaining thereto may be considered during the proceedings.
- King Price encourages employees or third parties to put their names to allegations made. However, anonymous submissions can be made. Where the identity of a reporting individual is left anonymous, that person is encouraged to provide an anonymous email address or other contact details in the event that additional information or feedback is required.

## Reporting information

In respect of minor issues, an employee or third party should preferably raise their concerns with the immediate manager of the employee who's the subject of concern. However, the employee or third party is also entitled to make use of the whistleblowing process.

Complaints or other information can be reported to 0860 004 004 or [kingprice@behonest.co.za](mailto:kingprice@behonest.co.za)

The complaint or information should at least set out:

- The background and history of the concern.
- The names of the individuals responsible.
- Relevant dates and places (where possible).
- The reason why the whistleblower is concerned about the situation.

The process is managed by an independent third party service provider ('whistleblower call centre') which won't disclose the identity of the reporting individual to King Price, unless they've specified the contrary. The whistleblower call centre will assess the nature of the information/the ambit of the complaint and will direct this to King Price's company secretary.

In the event that the company secretary is implicated in the information or the complaint, the matter will be forwarded to the head of risk, or alternatively the chairman of the risk and compliance committee. Upon receipt of the information, the matter will be dealt with according to the internal investigation and disciplinary processes of King Price, which will be determined by the ambit and surrounding factors of the information received. A reporting individual isn't expected to prove the truth of the allegations made. However, they must provide sufficient facts and information to demonstrate that there are grounds for concern.

## Investigation

In order to protect the individuals concerned (as well as King Price) initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. Where necessary, the information will be disclosed to the chief executive officer.

King Price will, upon receipt of information or a complaint:

- Enter particulars of the complaint in the whistleblowing register.
- Initiate a preliminary inquiry/review on the allegations.
- Refer the matter to the appropriate departmental head, executive committee member, or internal/external auditors if the results of the preliminary review indicate the need for further investigation.

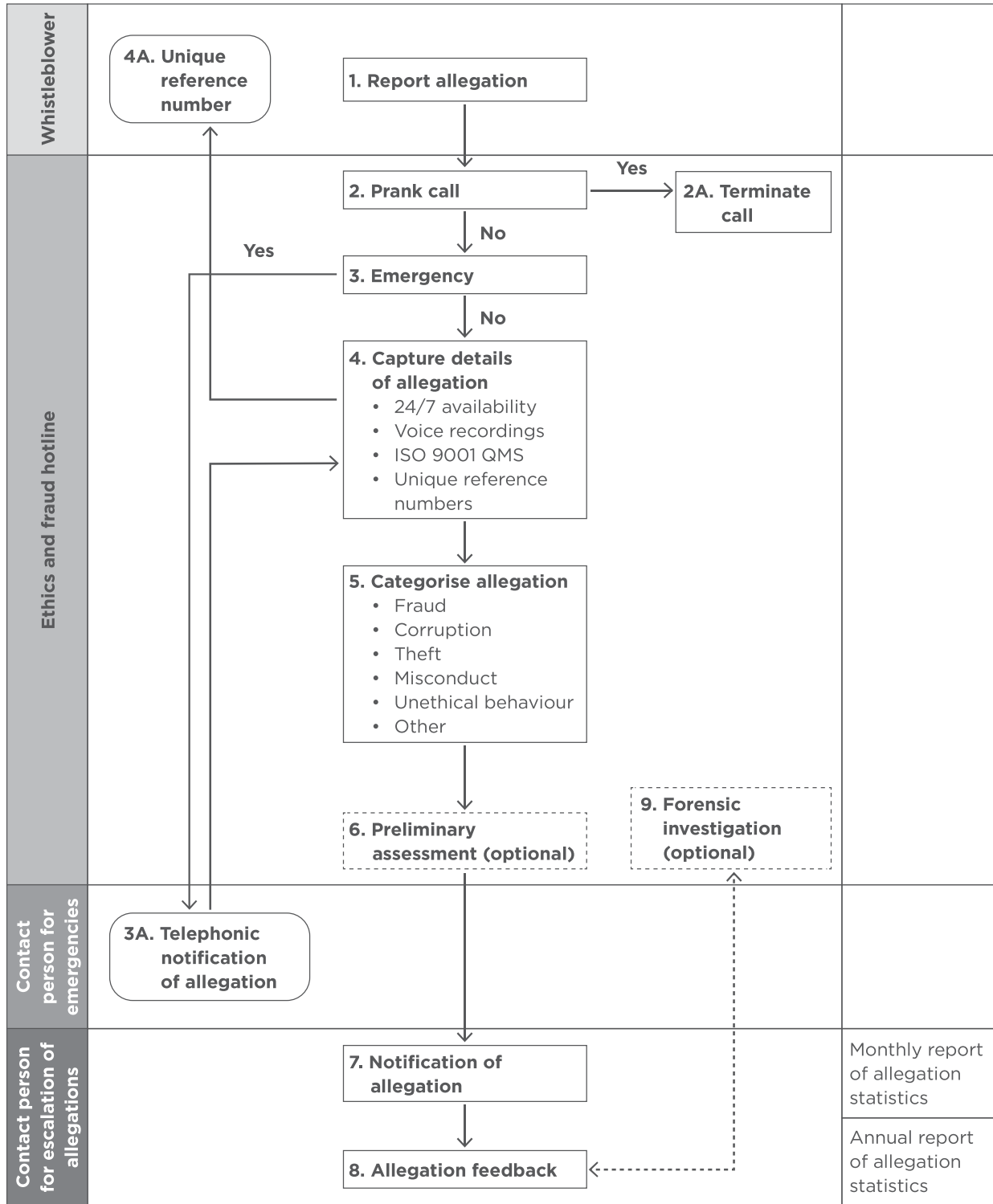
Please refer to the annexure hereto for a complete process flow of the whistleblowing process.

If necessary and where possible, additional information may be requested from the reporting individual. King Price can't undertake to automatically provide feedback to the whistleblower on the outcome of the investigation of the complaint due to factors such as anonymity of the complainant, legal restrictions on distribution of privileged information, and related considerations. Requests for feedback are therefore considered on a case-by-case basis.

### Creating awareness

King Price will ensure the distribution of the policy to employees and that the details of the whistleblower call centre are made freely available to clients through its policy documentation.

## Process flow



## Process flow description

### Step 1: Report allegation

Whistleblowers can report an allegation to the ethics and fraud hotline 24/7 using 1 of the following channels:

Intranet [Click here](#) for more information

Phone 0860 004 004

Email [kingprice@behonest.co.za](mailto:kingprice@behonest.co.za)

Whistleblowers have the right to remain anonymous.

### Step 2: Call screening

- Prank call
  - Calls received by the ethics and fraud hotline are screened to eliminate prank calls.
- Terminate call
  - Prank calls are terminated, and no details are captured.

**Please note:**

The same process will be followed for calls where information is requested.

### Step 3: Emergency allegation

- Emergency
  - Calls received by the ethics and fraud hotline are screened to determine if the allegation should be classified as an emergency.
- Telephonic notification of allegation
  - In the event of an immediate or physical threat (emergency allegation), the information will immediately be reported to the 'contact person for emergencies' (available 24/7), whereafter the allegation will be captured and transcribed as per the normal process.

**Please note:**

Emergency allegations include incidents such as a bomb scare.

### Step 4: Allegation details

- Capture details of allegation
  - Allegations are captured and transcribed and a unique reference number is assigned to each allegation.

**Please note:**

The geographical information will also be captured and included in the monthly and annual reporting.

- Unique reference number
  - The ethics and fraud hotline agent will provide the whistleblower with a unique reference number, so that the whistleblower can provide more information on another date, or follow up on the allegation if they want to.
  - For anonymous whistleblowers, the reference number is only provided telephonically. Alternatively, if contact details are available, the ethics and fraud hotline manager will send the reference number to the whistleblower via email.

### Step 5: Categorise allegation

Allegations are categorised as follows:

- Fraud: Forgery, falsification of documents/claims, and identity theft.
- Corruption: Any form of bribery, third party collusion, or contract and procurement irregularities.
- Theft.
- Misconduct: Harassment, any form of discrimination, intimidation, abuse/misuse of company property, time and attendance abuse, or abuse of authority.
- Unethical behaviour: Favouritism, nepotism, or conflicts of interest.
- Other.

### Step 6: Preliminary assessment (optional)

As an optional additional service, the ethics and fraud hotline can conduct a preliminary assessment on all allegations received. This preliminary assessment will include an initial assessment of the allegation before it's escalated to the relevant contact person/s in order to assist the relevant contact person/s in prioritising allegations.

**Step 7: Notification of allegation**

Allegations are escalated to the relevant contact person/s as soon as they've been transcribed and captured.

**Step 8: Allegation feedback**

For the ethics and fraud hotline to provide the correct feedback to the whistleblower regarding the investigation of an allegation, the relevant contact person/s should keep the allegation feedback updated.

If a whistleblower contacts the ethics and fraud hotline to get feedback regarding the investigation of an allegation (and no feedback has been captured) the ethics and fraud hotline agent will contact the relevant contact person/s.

**Step 9: Forensic investigation (optional)**

As an optional additional service, the ethics and fraud hotline can conduct a forensic investigation on allegations.

**Reports**

**Monthly and annual reports of allegations**

A confidential report will be provided on a monthly and annual basis on all allegation statistics.

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Department responsible for the policy	Governance
Approved by the board of directors on	19 July 2023
Approval confirmed by company secretary, duly authorised on behalf of the board	