



V3 Consulting Engineers (Pty) Ltd

Whistleblowing Policy

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Revision 00



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Signature:		

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1. Purpose

V3 Consulting Engineers (Pty) Ltd (V3) is committed to the highest standards of ethical, moral and legal business conduct. Ethical business behaviour is the responsibility of every employee in the company and is reflected not only in our relationships with each other but also with our customers, suppliers, shareholders, and other stakeholders. The Company's Code of Conduct Policy as well as related Company policies are a key component of its commitment to high standards of business and personal ethics in the conduct of its business.

The Code of Conduct Policy is intended to focus all employees across the Company on areas of ethical and legal risk, provide guidance to all employees to help them recognise and deal with ethical and legal issues, and provide mechanisms to report unethical and unlawful conduct so as to foster honest, ethical and legal behaviour across the Company. All employees must comply with the letter and spirit of the Code of Conduct Policy.

In line with this commitment, we expect employees and others that we deal with, who have serious concerns about any aspect of the Company's work to come forward and communicate these concerns through the appropriate channels provided by the Company, without any concerns or fear of victimisation. It is recognised that wherever practical, and subject to any legal constraints, matters reported will proceed on a confidential basis.

All employees are strongly encouraged to report their concerns through the normal business channels, which can include immediate Line Managers, Business Unit Managers (BU Managers), Human Resources (HR) representatives or Executive Management.

The introduction of the Company's FaceUp platform is a supplementary reporting mechanism through which to raise concerns, if for any reason you are uncomfortable with using the normal business channels or unsatisfied with the response from the normal business channels. The system is available for use by all the Company's stakeholders.

The objective of this Whistle Blowing Policy is to reinforce the Code of Conduct and provide assurance to all employees, and other stakeholders related to the Company that they will be protected from any penal action or victimisation arising from any legitimate matters reported through any of the reporting channels provided for by the Company.

2. Affirmation and Compliance with the Protected Disclosures Act

The Protected Disclosures Act, Act 26 of 2000:

The Company subscribes to the principles and requirements of this Act and in order to reaffirm our compliance with the Act, the Company will:

- Ensure protection of employees who submit a disclosure in good faith and use the appropriate reporting channels provided by the Company;
- Strive to create a culture which will facilitate the disclosure of information by employees relating to criminal and other unethical or irregular conduct in the workplace in a responsible manner by providing clear guidelines for the disclosure of such information and protection against reprisals as a result of such disclosure;
- Promote zero tolerance to any criminal and other unethical or irregular conduct within the Company.

3. Scope

This Policy is consistent with and aligned to the Code of Conduct Policy and addresses Company accountability, transparency and individual responsibility by encouraging individuals to report wrongful

conduct and behaviour in the workplace as measured against the Code of Conduct in a responsible and ethical manner.

This Policy is intended to assist employees who reasonably and in good faith, believe they have knowledge of impropriety or wrongful conduct. It is not designed to question financial or business decisions taken by the Company, nor should it be used to ventilate any matters which have been or should be investigated under the Company's harassment, grievance or disciplinary policies and procedures.

It is expected that employees will report any violation (actual or suspected) of the Code of Conduct first to Management, and only in the event where they have reasonable grounds for believing that reporting such through formal channels will lead to some form of victimisation, harassment and/or disciplinary proceedings may they report the matter through the FaceUp platform.

This Policy applies to all entities within V3, all subsidiaries and Business Units, operations as well as to everyone who carries out work for the Company, including:

- Employees;
- Clients;
- Shareholders;
- Contractors and Sub-contractors; and
- Consultants.

This Policy is designed to deal with bona fide concerns raised in relation to issues relating to fraud, corruption, misconduct and wrongdoing within V3. It is not applicable to human resources or industrial relations grievances, which are dealt with under distinct procedures on grievances, discipline and misconduct.

This Policy covers all legitimate concerns raised in good faith, in connection with any of the following alleged acts ("the Misconduct"), which includes:

- breach of the Code of Conduct;
- civil or criminal wrongdoing;
- failure to comply with any statutory and/or other legal obligation or requirement;
- financial or non-financial mismanagement, fraud, corruption and bribery;
- any risk or potential risk to the environment, or to the health and safety of any individual;
- improper conduct or unethical behaviour; or
- concealment of any of the above.

4. The Reporter

Any person, who works for or with V3 directly or indirectly and who has a reasonable belief that there is Misconduct ("the Reporter"), may raise a concern or make a disclosure under the procedure set out below.

All concerns must be raised without malice, in good faith and not for personal gain.

The Reporter making the disclosure, must reasonably believe that the information and the allegations made are substantially true and accurate.

The issues raised should relate to a director, manager, employee, and/or any operation or joint venture within the Company.

5. Confidentiality

All individuals involved in receiving any disclosure made in terms of this Policy, will be cognisant of the need for confidentiality and will deal with each matter on this basis as far as reasonably possible, within the provisions of this Policy.

Matters disclosed in terms of this Policy will at all times be dealt with in a sensitive manner within a reasonable timeframe.

6. Reporting Protocol

The Reporter may report the Misconduct as follows:

- a) Any concern by an employee about Misconduct should first be raised by the Reporter with his/her line manager.
- b) Any concern by any other stakeholder about Misconduct should be raised by the Reporter with the Chief Executive Officer / Business Unit Manager (BU Manager) of the company with which his/her company is contracting.
- c) Should the Reporter feel threatened or intimidated to report the matter as suggested above, such Reporter should report the Misconduct through the FaceUp platform. This is an independent and confidential reporting service administered by Human Resources (HR).
- d) Concerns may be raised orally or in writing. Reporters who wish to make a written report are invited to set out the following:
 - the background and history of the concern (giving relevant dates);
 - the reason for being concerned about the situation; and
 - the extent to which he personally witnessed or experienced the problem (provide documented evidence where possible).

Although you are not expected to prove beyond reasonable doubt the truth of an allegation, you will need to demonstrate to the person contacted that there are reasonable grounds for your concern.

7. Employee Entertainment

The person to whom a report is made (“the Responsible Person”) is required in good faith to independently and thoroughly investigate the reported matter. The services of forensic consultants may be used if appropriate, and a comprehensive report on the findings and corrective actions taken (if any) shall be issued and filed by the Responsible Person for review by Internal Audit.

In the case of a matter reported through FaceUp, there is an agreed follow-up procedure set out in the protocol agreed with the platform. Any investigation instruction flowing from that process to a Company executive (“the Responsible Person”) shall be independently and thoroughly investigated, and a comprehensive report on the findings and corrective actions taken (if any) shall be lodged with the executive issuing the instruction.

In dealing with the matter, the Responsible Person may consult with any member of the executive management of the Company, as he/she deems appropriate.

If, in the course of the investigation of any report, the Responsible Person is of the opinion that the matter is of a grievance or disciplinary nature, the appropriate procedures as referred to in clause 3.5 above will be invoked.

The decision of the Responsible Person as to whether there is a prima facie case to investigate and, if so, the outcome of the investigation or whether the matter should be dealt with as envisaged in clause 7.4 above, will be communicated to the Reporter in such manner as the Responsible Person deems appropriate.

8. Anonymity of the Reporter

In view of the protection afforded to individuals raising a bona fide concern, it is preferable that the Reporter puts his name to the report. The Company will not tolerate and/or entertain the harassment or victimisation of anyone raising a legitimate concern. The latter would equally apply where the Reporter is mistaken as to the true nature of the issue.

It is, however, recognised that a Reporter may wish to raise a concern in confidence under this Policy and, in such instance, the identity of the Reporter will not be disclosed without his consent.

A Reporter who wishes his/her identity to remain confidential, must specifically inform the person to whom the report is made, of this fact.

If a situation arises where the matter cannot be resolved without revealing the identity of the Reporter, this will be discussed with the Reporter before any action is initiated and the best way forward will be agreed.

9. Protection of the Reporter

The Company acknowledges that the protection of the Reporter is fundamental to the success of the whistle-blowing process.

No Reporter who makes a disclosure in good faith, reasonably believing it to be true, will as a consequence of making the disclosure, be:

- subjected to any disciplinary action;
- dismissed, suspended, demoted, victimised, harassed or intimidated;
- transferred against his/her will;
- refused a transfer or a promotion;
- refused a reference or provided with an adverse reference;
- threatened with any of the above; or
- otherwise adversely affected in his/her employment, including employment opportunities and work security.

The above protection is not afforded to a Reporter who has made a disclosure concerning his/her own misconduct.

Deliberate reporting of false information equates to misconduct and is not protected by this Policy or the law.

10. Reporting and Recording of Disclosures

A disclosure is a reported concern that has been submitted by an employee, or external stakeholder acting in good faith using the FaceUp platform. It does not include issues or concerns raised by employees through normal business channels in an open, non-confidential manner. All disclosure reports will be treated in confidence.

Disclosures will be received from FaceUp and reports will be prepared for communication to the following authorised HR individuals listed in the table below:

Name and Surname	Designation	E-mail Address
Nominee 1	HR Manager	Sivu.mkula@v3consulting.co.za
Nominee 2	HR & Recruitment Coordinator	Nthabiseng.dikobe@v3consulting.co.za

Under normal circumstances, all reports will be sent to both Nominee 1 and Nominee 2 as the primary recipients. However, a relevant escalation process has also been defined for certain circumstances as follows:

- Should nominee 1 or 2 be implicated, the report will be escalated to Executive Committee.

All reports provided to the reporting personnel as indicated above will eliminate any element that could identify the employee making a disclosure. This means that the employee will remain totally anonymous if they have chosen to use this option.

However, the identity of an employee will be provided to the Company if the following condition is met:

- The employee has given their verbal consent to FaceUp to communicate their identity to the Company.

11. Implementation and Responsibility

The Company recognises that, to ensure the effective implementation of this Policy, it should be communicated and fully understood by all stakeholders.

Management of the Company is responsible for ensuring that adequate awareness is created internally regarding the scope and objective of this Policy, including the mechanisms created for disclosure.

The Management of V3 is responsible for ensuring that:

- This Policy is communicated and implemented where applicable
- Resources and facilities are available to implement the requirements of this Policy and process.

12. Non-Compliance

Employees who violate relevant aspects of this Standard will be subject to disciplinary action.

Any disciplinary decision applied by V3 in any situation shall be without prejudice to any civil and/or criminal consequences to which the violation may give rise.

13. References / Related Documents

Document	Retention / Storage		Responsibility
	Location	Time	

14. Summary of Changes / Revision History

Date	Version	Changed by	Description of change
12-03-2024	00	S Mkula	New policy document