



PERSONNEL POLICIES AND PROCEDURES

Updated: 01 June 2020

SUBJECT : **WHISTLE BLOWER AND ETHICS POLICY**

This section is applicable to all employees, directors, contractors, and stake holders of Personal Trust (Pty) Limited, and its subsidiaries.

1. Pre-ambble

- 1.1 As custodian of client assets, investments and all matters relating to investment, retirement, estate and tax planning, it is central to the company's service offering that all employees, directors, and all persons related to the organisation conduct themselves in a manner that protects said client interests.
- 1.2 It is also central to the organisational corporate culture that all employees, directors and all persons related to the organisation conduct themselves in a matter which is in keeping with company values relating to trust, integrity and do so with due care to client matters as well as the future sustainability of the company.
- 1.3 This policy is intended to guide employees in raising concerns about possible unlawful and unethical conduct or breaches of company policy to the right people in a safe and secure way and provides information as to what should be reported. It provides guidelines as to procedure to be followed in making a disclosure, as well as the protection be afforded to employees raising concerns of this nature.
- 1.4 Concerns about wrongdoing may relate to any employee, including all levels of management, a colleague, an outsider, customer, service provider, business partner or an ex-employee. Concerns may also relate to past, present, or future conduct.
- 1.5 The company has a zero-tolerance approach to the commission of fraud and the concealment of fraud within the Company. Allegations of such acts will be investigated and pursued to their logical conclusion, including criminal prosecution, disciplinary action, and any other legal action.

- 1.6 All employees have a general duty to act in the best interest of their employer. Where an employee suspects or identifies an act of fraud s/he should immediately report it to the Human Resources Director, Company Chairman, or any Director for further investigation. Employees who wish to remain anonymous should contact the Chairman of the Audit Committee. The following contact details would apply:

Name:	Designation	Contact details:
Nicole McIntyre	HR Director	Email: nmcintyre@ptrust.co.za Tel: 021-689-8975/ 082-448-0319 Fax: 021-686-9093
John le Roux	Chairman	Email: jleroux@ptrust.co.za Tel: 021-689-8975/ 082-452-7854 Fax: 021-686-9093
Philip Strachan	Audit Committee Chairman	Email: pstrachan@iafrica.com Tel: 021-6895780/ 083 286 7381 Fax: 021-689 5781

- 1.7 Any employee may query any part of this policy with any member of the Whistleblowers and Ethics Committee. Any employee may also approach any member of the Whistleblowers and Ethics Committee for guidance and clarity should he or she suspect or identify an act of fraud or any possible unlawful or unethical conduct or breaches of company policy.

Committee members	Contact details:
John le Roux	Email: jleroux@ptrust.co.za Tel: 021-689-8975/ 082-452-7854
Jacqui Meyer	Email: jmeyer@ptrust.co.za Tel: 021-689-8975/ 083-632-3079
Nicole McIntyre	Email: nmcintyre@ptrust.co.za Tel: 021-689-8975/ 082-448-0319
Portia Vlotman	Email: pplotman@ptrust.co.za Tel: 021-689-8975/ 072-260-6622
Renette Hendriks	Email: rhendriks@ptrust.co.za Tel: 021-689-8975
Margot Arends	Email: marends@ptrust.co.za Tel: 021-689-8975.
Naazia Hoosain	Email: nhoosain@ptrust.co.za Tel: 021-689-8975.

- 1.8 Employees also have a responsibility to familiarize themselves with the contents of this policy. Where an employee is unclear on what may constitute an act of fraud s/he should seek further guidance from the relevant manager, Whistleblowers and Ethics Committee member or Human Resources Director.

2. What to report

- 2.1 The whistle blower is encouraged to come forward if any of the following offences is being committed, has been committed, or is likely to be committed:
- 2.1.1 Criminal offences such as fraud, theft, corruption, money laundering and terrorism
 - 2.1.2 Any type of financial misconduct, including negligence
 - 2.1.3 Failure to comply with any legal obligation
 - 2.1.4 Danger to the work environment or the health and safety of others

- 2.1.5 Damage to the environment
- 2.1.6 Unfair discrimination
- 2.1.7 Any form of harassment
- 2.1.8 Internal irregularities, including conduct that goes against any company policy or procedure
- 2.1.9 Deliberate cover-up or concealment of any of the above
- 2.1.10 Any other unlawful or unethical conduct relating to the workplace

2.2 If reporting a suspected irregularity, consider:

- 2.2.1 Is it legal?
- 2.2.2 Does it feel right?
- 2.2.3 Is it in line with the company's corporate values?
- 2.2.4 How will it affect the team and the business as a whole?
- 2.2.5 Would it negatively impact on the company's reputation if it became public knowledge?
- 2.2.6 Would it cause embarrassment if a manager, supervisor or colleagues were aware that this irregularity was known to some and those persons failed to report it?
- 2.2.7 Is there a legal obligation to report the irregularity?

3. How to report

- 3.1 A protected disclosure must be made in writing to the Human Resources Director, Company Chairman, or any Director of the company.
- 3.2 If, for whatever reason, the person making the disclosure wishes to do so anonymously, then this can be to the Audit Committee Chairman, on the details above.
- 3.3 Such a disclosure must be made as soon as possible after becoming aware of the possible unlawful and unethical conduct or breach of company policy.
- 3.4 This disclosure must not be disclosed to any other person, unless authorised in writing.
- 3.5 Disclosures made to any external person not specified in this policy may not enjoy protection under the Protected Disclosure Act.

4. Protected disclosures

- 4.1 The Protected Disclosures Act No. 26 of 2000 (the Act) aims to protect employees from being harassed, victimised, or dismissed when they blow the whistle on wrongdoers in the workplace
- 4.2 In order for a disclosure to be protected, it must be made in good faith and not made for personal gain. The employee disclosing the information must have reasonable grounds for believing that the allegations made are true.
- 4.3 Employees who knowingly make fictitious allegations, or concerns that are raised maliciously, for personal gain or reward may result in that employee not qualifying for protection under the Act or in terms of this Policy. Accordingly, good faith reports that qualify for the protection of the Act are known as Protected Disclosures.
- 4.4 Knowingly making a false disclosure or making a disclosure with ulterior motives may also lead to disciplinary action being taken against that reporter.