



Whistle-Blowing Policy

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Version 1.6

> A2X MARKETS

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1. Document Administration

Document Version Control

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Apr 2017	1.1	Original Document	Gary Clarke
Sept 2018	1.2	Annual Review	Luthfia Akbar
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2. Purpose

The purpose of this policy is to allow you or any stakeholder the freedom to raise any valid and verifiable concerns about all unethical practices occurring in the workplace, in a confidential and / or anonymous manner without any fear of victimisation or retaliation.

3. Guidelines- When and What to Report

You should report when you believe that certain misconduct or unlawful or unethical practices, supported with verifiable evidence, are taking place. Below is a list of some examples of such practices:

3.1 **Fraud and Misconduct**

- 3.1.1 Submitting fraudulent overtime and leave claims
- 3.1.2 Misappropriation of company funds
- 3.1.3 Sexual harassment and intimidation
- 3.1.4 Employees under the influence of alcohol or drugs

3.2 **Unethical Behaviour**

- 3.2.1 Practising favouritism and nepotism
- 3.2.2 Transgression of any company policies
- 3.2.3 Conflicts of interest

3.3 **Theft and Corruption**

- 3.3.1 Theft of any company resources (stationary, equipment, intellectual property)
- 3.3.2 The request for and receipt of kickbacks in exchange for contracts or favours
- 3.3.3 Any form of bribery
- 3.3.4 Any unlawful collusion, including with 3rd parties

3.4 **Other**

- 3.4.1 Any other standards or transgressions as described in any A2X policies and procedures.



4. What to Consider Before Making a Report

Consider the following:

- 4.1 The seriousness of the alleged behaviour or misconduct;
- 4.2 Whether the alleged behaviour or misconduct is likely to continue in the future;
- 4.3 Whether the reporting of the concern is a breach of confidentiality of A2X towards any other person.

Ensure that the information you have contains the following as the minimum:

- 4.4 In which division did the incident take place?
- 4.5 Date and time of the incident
- 4.6 What is the nature of the incident?
- 4.7 How long has this been going on?
- 4.8 How often does this happen?
- 4.9 Number of people involved and names?
- 4.10 Do you have any proof?
- 4.11 Are there any witnesses?

Any intentional negligent misrepresentation of the facts or a false allegation when reporting a concern, is gross misconduct and if found guilty of such an offence, disciplinary action will be instituted against you and you may be dismissed.

5. Reporting Channels

When unsure about events or faced with an ethical dilemma or you have observed an incident of unethical behaviour taking place, we encourage you to report the incident using the following channels:

- 5.1 Consult your line manager, or in the event that a conflict exists with your line manager, then
- 5.2 Consult a senior manager or another manager, or
- 5.3 Consult HR, or the Head Legal and Regulation,



- 5.4 If you are not comfortable with any of the above options you may report the incident safely, and confidentially to the CEO of A2X who may be contacted at the following email address: Kevin.Brady@a2x.co.za.

6. What Happens After a Report or Disclosure is made

- 6.1 Concerted effort will be made to conduct internal investigations, and at the discretion of the person receiving the report, an external investigation may be warranted.
- 6.2 Feedback will be provided once a week regarding the progress or status of the investigation, with the intention of resolving the matter as speedily as possible within four weeks.
- 6.3 Any investigations that exceed this timeframe will accordingly be communicated to the relevant persons with reasons for the delay.
- 6.4 The outcome of the investigation will be communicated to the whistle blower and all relevant parties. If any party is dissatisfied, they may raise this concern with the Chairman of A2X or a non-executive director of A2X.

7. Protection of the Whistle-Blower

We will ensure that we do everything possible to protect the anonymity of the whistle blower. Protection is also afforded to the whistle blower through legislation:

- 7.1 The Protected Disclosures Act (2000);
- 7.2 The Promotion of Equality and Prevention of Unfair Discrimination Act (2000); and
- 7.3 The Labour Relations Act (Schedule 8 “Code of Good Practice”).

However, reporting an incident in no way provides immunity to the whistle blower if they were party to the misconduct.

8. Personal Employment Grievances

This policy does not deal with grievances relating to your personal employment situation. Such matters need to be dealt with in accordance with A2X policies and procedures or discussed with the Head of Legal and Regulation.