

## WHISTLEBLOWING POLICY

### PURPOSE

This policy addresses Sahara Group's commitment to our tenets of integrity and ethical behavior by ensuring that we maintain an environment where employees and other stakeholders can act appropriately, without any fear of retaliation.

To maintain these standards, Sahara Group provides employees and other stakeholders who have genuine and reasonable concerns about misconduct, malpractice and any serious breach of any law and/or regulation within and outside the company, the opportunity to come forward to raise those concerns in an atmosphere of mutual trust and confidence.

In our efforts to continually strive for focus, integrity, loyalty, discipline and excellence in carrying out our business activities, the policy is to help support and encourage employees and/or stakeholders to report and disclose improper and/or illegal activities.

However, for the organization to investigate the issues brought up by a whistle blower, it must be reasonably ascertained that employees and/or stakeholders are acting on reasonable grounds and there is no malicious intent in the disclosure.

### SCOPE

This policy applies to all staff, directors and officers of Sahara Group who may have a complaint which he/she wishes to be addressed but feels the complaint is so serious or is of such a confidential nature that it cannot be discussed with the line manager, head of department or HR manager in line with the procedure set out in the company grievance procedure.

In addition, anyone outside the organisation who believes that there is a **"reportable act"** that should be brought to the attention of the organization, the procedure outlined in this policy should be followed.

Reportable act for the purpose of this policy includes but is not limited to the following acts and/or conducts;

- Illegal, dishonest, fraudulent or corrupt
- In breach of applicable industry practice
- In breach of the laws of the land
- In breach of the company's code of conduct / ethics
- Gross mismanagement
- Serious waste of resources

- Unsafe work practices
- Any other conduct that is likely to cause financial or non-financial loss to the company and/or brand and reputation, or otherwise be detrimental to the interests of the company.

## **WHISTLEBLOWING PROCEDURE**

A whistleblower is a person or entity making a protected disclosure about improper or illegal activities. As stated earlier, could be employees, applicants for employment, vendors, agents, suppliers, contractors, customers or general public.

The role of the whistleblower is that of reporting. They are not the investigators or the finders of fact, neither can they determine the extent of the appropriate corrective or remedial action that may be warranted and/or taken.

Where the complaint is from within the company, the whistleblower can send an email tagged **“express yourself”** to [expressyourself@sahara-group.com](mailto:expressyourself@sahara-group.com); or the **“express yourself”** section on the Sahara Group website i.e. [www.sahara-group.com](http://www.sahara-group.com).

The whistleblower should raise the issue without delay once it arises.

The whistleblower can report the event with his/her identity or anonymously, but should note that it is more difficult to investigate suspicions and/or allegations without having direct access to the individual who raised the concern.

The whistleblower should report crimes against person and property, such as assault, rape, burglary, etc. immediately to the local law enforcement personnel and the line manager. Management shall promptly act to investigate and resolve the issue.

The company aims to resolve all matters as quickly as possible. However, some issues will be more complex and therefore may require longer to be fully investigated. Consequently timescales for handling and responding to the “whistle” will vary, and depend on the individual circumstances of each case.

If the investigation of a report, that was done in good faith and investigated by management, is not to the whistleblower’s satisfaction, then he/she has the right to report the event to the appropriate regulatory and/or governing body. However, we expect that in almost all cases raising concerns internally will be the most appropriate action for you to take.

The identity of the whistleblower if known shall remain confidential to the investigating authority, unless the issue requires investigation by law enforcement.

### **ACTING IN GOOD FAITH**

Good faith is evident when the report is made without malice or consideration of personal benefit and the employee has a reasonable basis to believe that the report is true. Good faith is lacking when the disclosure is known to be malicious and false.

Any employee or director who makes a report in bad faith is subject to discipline, including termination of board appointment or employee status, or other legal means to protect the reputation and brand of the organization and members of its Board and staff.

Disciplinary / legal action will be taken against anyone deliberately raising false and malicious allegations against the company.

### **REPRISAL**

Directors, officers or employees who acted in good faith by reporting violation of the Code shall not suffer any form of harassment, retaliation or adverse employment consequence. Anyone who retaliates against the whistleblower (who reported an event in good faith) will be subject to discipline, including termination of board appointment or employee status.

The whistleblower shall receive no retaliation or reprisal for a report that was provided in good faith even if the report turns out to be wrong i.e. that was not done primarily with malice to damage another or the organisation.