



Protected Disclosures ("Whistle Blowing") Policy

Scope

The South African government acknowledged the need to offer legal protection to whistle blowers with the introduction of The Protected Disclosures Act, Act 26 of 2000, more commonly known as 'the Whistle Blowers Act'.

The Whistle Blowers Act introduced provisions for employees, both former and current to report unlawful or irregular conduct by employers and fellow employees, while providing for the protection of employees who blow the whistle. The Act was amended by The Protected Disclosures Amendment Act, Act 5 of 2017.

The Protected Disclosures Policy will apply to anyone who wishes to report any incident and/or tip-off that in their opinion may relate to any unethical or unlawful conduct by any person within their relationship with Zenith for the Accomplished (Pty) Ltd.

Definitions

"Us" and **"We"** means Zenith for the Accomplished (Pty) Ltd with company registration number 2006/032693/07.

"You" and **"Your"** refers to any individual associated or employed by Zenith for the Accomplished (Pty) Ltd itself and/or any of its intermediary partners, service providers or policyholders or ex-employees of these mentioned groups.

"Whistle blower" the person who has made a disclosure and wishes to remain anonymous.

"Whistle blowing" inside the scope of this policy is the reporting by a person of any wrongdoing such as fraud, mismanagement, breach of laws or any other illegal or unethical act throughout any business, partnership and/or contractor used by Zenith for the Accomplished (Pty) Ltd.

Protected Disclosure "Whistle Blower" Policy

This policy provides the procedures and guidelines for you to report practices that are in contradiction to: ethical business practices, lawful conduct and financial practice standards or that pose a danger to the public or the environment.

We herewith intend to address organisational accountability, transparency, and individual responsibility by encouraging you to report the above-mentioned practices in a responsible and ethical manner.

This policy does not apply to the lodging of personal grievances. A disclosure made internally is a protected disclosure.

Any disclosure shall constitute a protected disclosure, in terms of this policy, if you:

- act in good faith; and
- follow the process set out below.

How to make the Disclosure

Anyone who has a concern or who has information, about unlawful or irregular conduct in any part of the business, is in terms of this policy encouraged to first raise his or her concern with, or to first disclose the said information to the Compliance Department Executive, Pierre Marais.

Disclosures of suspected improper activities are encouraged to be made in writing via email to: pierre@zenithinsure.co.za

Such reports should be factual rather than speculative and contain as much specific information as possible to allow for a proper investigation.

Please inform us if you would like to remain anonymous throughout the process.

Duty to Investigate the Disclosure

The Compliance Department Executive:

- must conduct a proper investigation into the allegation;
- shall if so requested by you, keep your details confidential;
- may question you and you will have an opportunity for input during the investigation; and,
- must upon conclusion of the investigation provide justification in writing for the course of action decided on, even if no action is warranted.

Each allegation will be investigated on its merits: no allegation of wrongdoing shall be sustained unless the evidence supports the allegation on a balance of probabilities.

If the investigation leads the head of the compliance department to conclude that a crime has probably been committed, the results of the investigation must be reported to the South African Police Services and other relevant authorities.

Your Rights and Obligations

You, the whistle-blower, have a right to be informed of the outcome of the investigation. The outcome of the investigation may or may not support a conclusion that an improper act was committed, and if so, by whom.

For any disclosures made in good faith, protection from any occupational detriment does not extend to immunity for any involvement in the conduct disclosed.

Any disclosure made maliciously or in bad faith and without reasonable grounds for believing that the allegations are true, is a disciplinary offense.

Should you require any further information regarding the Whistle Blowers Act kindly submit your enquiry to compliance@zenithinsure.co.za.