Dis-Chem

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Whistleblowing Policy

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1. Purpose

To provide a framework to comply with relevant laws and regulations for whistleblowing.

2. Scope

This policy applies to all incidents, outside of the grievance policy, where workers feel it necessary to report suspected unethical behaviour related to the Dis-Chem group within South Africa.

3. Prescriptive references

The following documents are used as foundation for this document.

3.1 Protected Disclosure Act 26 of 2000 as amended.

3.2 HR-Policy-029-Grievance.

4. Terms and definitions

Term	Definition
Blow the whistle/ whistleblowing	When a person discloses relevant information concerning unethical behaviour to the appropriate independent 3rd party.
Corruption	Giving or offering, receiving or agreeing to receive, obtaining or attempting to obtain any benefit which is not legally due to or by a person.
Employee Relations (ER)	Employee Relations department.
Fraud	• The unlawful and intentional false representation or concealment of facts resulting in actual or potential prejudice to another; or • manipulation, omission or misrepresentation of financial results or financial reporting.
Grievance	When an employee feels dissatisfied with their employment situation or that they are being treated unjustly and it cannot be resolved informally.
In good faith	The belief that what is being done is right, honest, ethical and legal.

Intentional false allegation	An allegation, with or without malicious intent, which the whistle-blower knows to be untrue.
Report	For the purpose of this policy, it is the whistleblowing process as set out in this policy (9.2).
Suspected	Reason to believe the existence, presence, or truth of (something).
Theft	The unlawful and intentional misappropriation of another's property, with the intention to deprive the owner of its rights.
Unethical behaviour	For the purpose of this policy, it includes criminal offences (including but not limited to fraud, corruption or theft), failure to comply with legal obligations to which a person is subject, a miscarriage of justice, endangering the health or safety of people, environmental damage or unfair discrimination.
Unfair discrimination	Discrimination based on race, gender, sex, pregnancy, marital status, family responsibility, ethnic or social origin, colour, sexual orientation, age, disability, religion, HIV status, conscience, belief, political opinion, culture, language, birth or any arbitrary reason.
Whistle-blower	A worker who blows the whistle.
Worker	For the purpose of this policy, it includes individuals who currently or previously worked for the company, as well as independent contractors, consultants or agents.

5. General principles

5.1 The company has a zero tolerance towards unethical behaviour.

5.2 The company encourages workers to blow the whistle on any suspected unethical behaviour related to the company and its workers.

5.3 Workers should use the appropriate channels when whistleblowing (9.2).

5.4 Whistleblowing should not be used by employees to raise a grievance.

5.5 All reports, reported through the appropriate independent 3rd party, of suspected unethical behaviour will be investigated and if proven to be true, will be followed up by the appropriate action.

5.6 The company will maintain a record of all reported suspected unethical behaviour, as well as the investigation, outcome and actions taken.

6. Confidentiality

6.1 Whistle-blowers have the right to remain anonymous.

6.2 All information received will be treated confidentially, while allowing a full investigation to be conducted.

6.3 The investigation will be confidential and will not be disclosed to any person other than those who have a legitimate right to the information.

6.4 Records will be kept confidential and reports will not compromise confidentiality.

7. Protection of whistle-blowers

7.1 Whistle-blowers will be protected against the following when reporting unethical behaviour in good faith, using the appropriate channels:

7.2 Disciplinary action, dismissal, suspension, demotion.

7.3 Harassment, victimisation or intimidation.

7.4 Being transferred against their will.

7.5 Disciplinary, civil or criminal proceedings that might otherwise be initiated where the disclosure is prohibited by a law, agreement or practice.

7.6 Whistle-blowers cannot be protected against the consequences of participating in unethical behaviour.

8. Protection of the company and its employees

8.1 It is an offence to make intentional false allegations.

8.2 Where it is proven that an allegation is intentionally false, the employee who made it will be subject to disciplinary action.

8.3 If an intentionally false allegation results in harm, disciplinary action will be taken and the case will be reported to the relevant authorities.

9. Reporting and resolution of reported incidents procedure

9.1 It is the responsibility of all employees to immediately report any suspected unethical behaviour to their immediate line manager. If the employee has reason to believe that their immediate line manager is involved, it must be reported to the next level of management.

9.2 If a worker wants to report suspected unethical behaviour anonymously, they can report it to the appropriate independent 3rd party using the following:

9.3 Phone: 0800 444 315;

9.4 SMS: 33490;

9.5 Email: dischem@whistleblowing.co.za

9.6 Website: www.whistleblowing.co.za

9.7 ER, OPS Director and Head of Treasury will receive an anonymous report from the appropriate independent 3rd party.

9.8 ER will allocate the report to the relevant parties to conduct a preliminary investigation within 7 days of receiving the report.

9.9 The relevant parties will provide a detailed report to ER, OPS Director or Head of Treasury on the findings of the preliminary investigation, allegations and appropriate action to be taken or already taken and proof thereof.

9.10 If proof is found of unethical behaviour, relevant disciplinary action will be taken. Additionally:

9.11 If the company has suffered any losses or damages as a result of the unethical behaviour, the company may follow the appropriate procedures to recover the losses or damages from the employee or take civil action.

9.12 If the unethical behaviour is of a criminal nature, the company will pass on the information to the relevant law enforcement agency.

9.13 If the identity of the whistle-blower is known by the appropriate independent 3rd party, the company will provide feedback to the whistle-blower through the appropriate independent 3rd party.

10. Prevention controls

The company is required to immediately review, and where possible improve the effectiveness of the controls, if unethical behaviour took place.

11. Associated documents

The following documents are linked to this document:

11.1 HR-Policy-015-Disciplinary.