



Whistleblower Policy

Updated 2023



WHISTLEBLOWING POLICY

Issuer / Owner Department	Audit & Compliance	
Process(es) Involved	Governance, Ethics	Compliance
Risk(s) Involved	All risks	
Keywords	Governance, Policies, Ethics, Whistleblowing, Risk	

Level	Level 2
Scope	Organisation-wide
Classification	Internal
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Reference	ASLM-IAC-005
Date of Previous Version	N/A
Effective Date	01/11/2023
Renewal Date	31/10/2026

Related Documents	Compliance Policy Code of Conduct Confidentiality Policy
Regulatory Text(s)	N/A

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1. PURPOSE

The purpose of this policy is to present ASLM's framework for enabling employees and 3rd parties to report safely any actual or suspected violations of law and/or ASLM's code of conduct. This policy also seeks to provide standard guidance on how reported violations are managed, and outlines prohibited actions in respect of protecting whistleblowers.

2. SCOPE

This policy applies to all ASLM employees.

3. DEFINITIONS

The following definitions are applicable to this policy:

3.1.1 Whistle-blower

For purposes of this Policy, a "whistle-blower" is a person who comes forward and shares his/her knowledge on any actual or suspected wrongdoing which he/she thinks is happening in the whole organisation or in a specific department. A whistleblower could be an employee, contractor, or a supplier who becomes aware of any illegal activities. There are 2 types of Whistle-blowers:

- **Internal Whistle-blower** - are those who report the misconduct, fraud, or indiscipline to senior officers of the organisation such as Audit & Compliance Manager, COO, CEO or Board of Directors.
- **External Whistle-blower** – are those who report the wrongdoings to people outside the organisation such as ASLM's contracted hotline service provider, media, government officials, or police.

3.1.2 Ethics Hotline

An ethics hotline is a confidential way for employees to report ethical concerns without fear of retaliation. Managed by an internal department or third party, reports are investigated and addressed promptly to prevent escalation and damage to reputation. Ethics hotlines promote transparency, accountability, and trust.

3.1.3 Prohibited Actions

These are actions, commission of which, will be considered cause for immediate disciplinary action by ASLM, including but not limited to, termination of employment, and may also subject the offending person to criminal liability. For purposes of this policy, prohibited actions are outlined below:

- a. Destroying, altering, mutilating, concealing, covering up, falsifying, or making a false entry in any records that may be connected to a matter within the jurisdiction of a governmental agency, in violation of statutes or regulations
- b. Altering, destroying or concealing a document, or attempting to do so, with the intent to impair the document's availability for use in an official proceeding or otherwise obstructing, influencing or impeding any official proceeding, in violation of statutes or regulations
- c. Fraudulently influencing, coercing, manipulating, or misleading any independent public accountant engaged in the performance of an audit of the financial statements of ASLM for the purpose rendering such financial statements misleading, in violation of statutes or regulations
- d. acts of corruption, fraud and influence peddling
- e. behaviours contrary to the code of conduct

- f. unauthorized communication of confidential information, theft or leakage of data
- g. violations of human rights and fundamental freedoms, damage to the health and safety of persons or to the environment
- h. a violation of the organisation’s policies regarding suppliers/vendors
- i. Discharging, demoting, suspending, threatening, harassing, discriminating or retaliating in any manner against any employee, in violation of statutes or regulations, because of any lawful act by that employee who:
 - i. Provides information to or assists in any investigation by ASLM or other mandated body
 - ii. Files or assists in any action alleging a violation of statutes or regulations or
 - iii. Knowingly takes any action harmful to any person for providing truthful information to a law enforcement officer relating to the possible commission of an offence

4. STATEMENT OF POLICY

4.1.1 Alert/Concern/Complaint

- An alert/concern or complaint, in this policy, is defined as the reporting, without financial consideration and in good faith, of information about:
 - A crime or an offence
 - Influence peddling
 - A threat or harm to public interest
 - A violation or an attempt to conceal a violation of applicable laws
 - A breach of ASLM’s code of conduct
 - Suspected misconduct, based on reasonable grounds, concerning the operation of the organization, in connection with any of the prohibited actions outlined in section 3.1.3

4.1.2 Procedure for raising an alert

- Employees and others may communicate suspected violations of law or wrongdoing, including any concerns regarding questionable accounting (including deficiencies in internal controls) in several ways:
 - If an employee or other complainant wishes to remain anonymous, they can use ASLM’s confidential ethics hotline from any location, 24 hours a day, 7 days a week. This hotline is operated by an independent contractor, and gives the caller the option to remain anonymous with concerns documented and relayed to ASLM Management and Board of Directors for appropriate follow-up.
- The service provider for the Ethics Hotline service is Deloitte Tip-offs Anonymous (Pty) Ltd.

The hotline details (telephone) are as provided below:

Country	Number	Limitations	Language Provision
Ethiopia & All Other Countries	+27 31 571 5307	International South African number. Accessible from all networks at international	English 24/7. French and Portuguese during South African business hours - Mondays to Fridays

		call rates from any country to South Africa	between 08h00 and 17h00 CAT
South Africa	0800 331 666	Customized toll-free number. Toll-free access from all networks in South Africa	English 24/7. All ten other official languages during South African business days - Mondays to Fridays between 08h00 and 17:00 CAT

- In addition to the unique telephone numbers referred to above, Deloitte will provide ASLM with access to the Deloitte Tip-offs website at the following web address: www.tip-offs.com from which a tip-off may be sent by the Whistleblower. Deloitte also provides a unique email address as follows ASLM@tip-offs.com
- If an employee or other complainant wishes to **report internally**, they may do so, either anonymously or by identifying themselves to ethics@aslm.org. Complainants are assured that any information provided will be treated with the utmost confidentiality.
- An employee or other complainant can also make a complaint to their supervisor, or any member of ASLM Senior Leadership Team.
- Regardless of how a complaint was made, ASLM will treat all complaints with confidentiality and will aggressively investigate all complaints to conclusion. At all times, the complainant will be protected from all actions prohibited in section 3.1.3(d) above

4.1.3 Information to be provided by the complainant

- Whether you identify yourself, or not, in order that a proper investigation is conducted, please provide as much detail as possible such as:
 - Where and when the incident occurred
 - Names and titles of the individuals involved.
 - Any relevant details or documents/evidence

4.1.4 Handling Complaints/Alerts

- For alerts received through internal channels, the following procedures will be applied:
 - Alerts received through ethics@aslm.org or other internal channel will be escalated to the CEO, COO and Audit and Compliance Manager within 24 hours of receipt and logged in the Ethics Register
 - The Audit and Compliance Manager will be the focal point for conducting the investigation and may rope in any technical expertise from within or outside ASLM as approved by the CEO
 - If either the COO or Audit and Compliance Manager are implicated in the complaint, the CEO will exclude them from the decision making process on how the investigation will proceed
 - If the CEO is implicated in the complaint, the investigation will be supervised by the Board of Directors
 - At conclusion of the investigation, the findings and actions taken will be documented in the Ethics Register

- As appropriate, the CEO will involve or inform the members of the ASLM Board in connection with an internally raised complaint
- The Board of Directors may mandate additional scrutiny or investigation including by external auditors, legal counsel, or other experts at the Board's discretion
- For alerts received through the 3rd party service provider as provided in 4.1.2 above, the following procedures will be applied:
 - Contractor will escalate alert to ASLM Management in accordance with the terms of the ethics hotline management contract
 - Once the alert is escalated to ASLM Management, ASLM will handle the alert similar to the protocols on internal alerts highlighted above
- To the maximum extent possible, ASLM will ensure that all alerts are investigated, resolved and corrective action implemented and documented within reasonable timelines. Where the information provided in the alert is not sufficient to conclude an investigation, and ASLM has no way of continuing with the investigation, the alert will be closed with a note to file indicating as much.

4.1.5 Confidentiality

ASLM will treat all communications under this policy in a confidential manner, except to the extent necessary:

- i. to conduct a complete and fair investigation or
- ii. for review of ASLM's operations by ASLM's Board of Directors, its relevant Committee of the board, ASLM's independent public accountants or ASLM's Legal Counsel

Similarly, complainants are required to handle information obtained or provided as part of resolving the complaint, confidentially, unless compelled otherwise for a lawful purpose.

4.1.6 Retaliation

ASLM will not permit any negative or adverse actions to be taken against any employee or individual who in good faith reports a possible violation of law, including any concerns regarding questionable accounting or auditing matters, even if the report is mistaken, or against any employee or individual who assists in the investigation of a reported violation. Retaliation of any form will not be tolerated. Any act of alleged retaliation should be reported immediately and will be promptly investigated and appropriate measures will be taken to address the issue.

4.1.7 False Reporting

There may be instances where a disclosure is made, based on genuine belief by the worker that something is wrong at a particular time, which is subsequently demonstrated to be false or inaccurate. In such circumstances, if the worker is not anonymous, the organization will inform the worker of the high level discrepancy between their report and the facts at hand. Provided the organisation is satisfied that the worker acted in good faith and had a genuine belief that such a situation should be reported, no further action will be taken.

If it becomes apparent to management that the worker making the disclosure has acted maliciously or frivolously, or has acted for personal gain, this will be dealt with through the organisation's disciplinary process. Action taken may include summary dismissal for gross misconduct.

5. EXCEPTIONS

There are no exceptions to this policy.

6. CONTACT

For questions or feedback about this policy, please contact the Chief Executive Officer.

Approved by:

Name: Nqobile Ndlovu

Designation: Chief Executive Officer

Signature:

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Date: 08-Nov-23 | 7:58 PM EAT