

## MloD Whistle Blowing Policy

The MloD is committed to the highest standards of transparency and accountability in line with good corporate governance. This whistle blowing policy provides strict confidentiality and protection to employees for any disclosure made without malice and in good faith. The purpose of this policy is to provide a mechanism for employees to raise concerns anonymously under certain circumstances.

### 1. Guidelines

- a. The policy is designed to deal with concerns raised in relation to specific issues as outlined below:
  - i. criminal offence;
  - ii. financial or non-financial mismanagement, fraud and corruption, including bribery;
  - iii. a risk (including a potential risk) to health and safety of any individual;
  - iv. behaviour which is unethical in terms of the MloD Code of Conduct.
- b. Employees should only use the whistle-blowing procedure after having exhausted all of the internal MloD policies and procedures except if the employee believes and has a sound basis for believing that following set policies and procedures will lead to victimisation.
- c. This policy does not apply to personal grievances concerning an individual's terms of employment, other aspects of the working relationship, or relationships between employees or disciplinary matters. In such instances the MloD HR Policy and Guidelines and relevant legislation should be followed.
- d. Should it be determined during an investigation that the concerns raised in terms of this policy relate to an employment issue, the appropriate disciplinary procedures will be implemented.

### 2. Procedures

- a. Concerns must be raised without malice, must be in good faith and not based on office gossip nor must it be made for purposes of personal gain.
- b. The individual making the disclosure must reasonably believe that the information and the allegations contained therein are substantially true and provide all information and substantiating documentation.
- c. An employee, who has a reasonable belief that there is serious misconduct relating to any of the above matters, may raise a concern as per the procedures set out.
- d. Employees may email or phone the Chairman of the Corporate Governance Committee or the Chairman of Board of the MloD directly to disclose their concerns.
- e. On receipt of the communication, the recipient of the complaint, namely the Chairman of the Corporate Governance Committee or the Chairman of Board of the MloD shall make a decision as to whether there is a prima facie case to respond to the "concern" raised.
- f. An investigation may be recommended and depending on the nature of the matter, he/she may recommend that the matter be:
  - i. Investigated internally;
  - ii. Referred to External Auditors; or
  - iii. Subjected to an independent enquiry.
- g. All disclosures and subsequent actions taken shall be reported and approved by the Board of the MloD.