

WHISTLE BLOWING POLICY

1. INTRODUCTION

Tractionel Group Holdings, (hereafter referred to as TGH), is committed to the highest standards of ethical, moral and legal business conduct. This policy forms an integral part of our commitment to meet the expectations of our stakeholders as a responsible corporate citizen and commitment to high standards of business and personal ethics. Group, in the context of this policy, means collectively or separately and individually, depending on the context, TGH and each company which is a subsidiary of TGH or any company who is a subsidiary or sub-subsidiary of any company owned by TGH. The provisions of this policy are the responsibility of every person throughout the Group which is reflected not only in our relationships with each other but also with our customers, suppliers, shareholders, and other stakeholders.

It is expected from all employees and any stakeholders that the Group deals with, that activity by a fellow employee that is reasonably deemed to be dishonest, improper or unlawful (collectively referred to hereinafter as “improper conduct”) who have serious concerns about any aspect of the Group’s work to come forward and communicate these concerns through the appropriate channels provided by the company, without any concerns or fear of victimisation. It is recognised that wherever practical, and subject to any legal constraints, matters reported will proceed on a confidential basis.

All Group employees are strongly encouraged to report their concerns through the normal business channels, which can include, for example, line manager, human resources representatives, internal audit, or senior management representatives.

TGH is a wholly owned subsidiary of Enza Construction (Pty) Ltd (Enza). The **ENZA CONSTRUCTION 24HRS TOLL FREE WHISTLE BLOWERS’ HOTLINE**, (hereafter referred to as **24HRS TOLL FREE WHISTLE BLOWERS’ HOTLINE**), is a supplementary reporting mechanism through which to raise concerns, if for any reason, you are uncomfortable with using the normal business channels or unsatisfied with the response from the normal business channels. The system is available for use by all employees and contractors of both Enza and TGH.

The objective of this Whistle Blowing Policy is to reinforce the Code of Ethics and provide assurance to all staff, contractors and other stakeholders related to Enza and TGH that they will be protected from any penal action or victimisation arising from any legitimate matters reported through any of the reporting channels provided for by Enza and TGH.

2. AFFIRMATION AND COMPLIANCE WITH THE PROTECTED DISCLOSURES ACT

2.1. The Protected Disclosures Act 26 of 2000 came into effect on 16 February 2001. TGH subscribes to the principles and requirements of this Act and to reaffirm our compliance with the Act, TGH will:

- Ensure protection of employees who submit a disclosure in good faith and use the appropriate reporting channels provided by TGH;
- Work to foster a culture that encourages employees to responsibly disclose information related to criminal activity and other unethical or irregular conduct in the workplace, by providing clear guidelines for making such disclosures and ensuring protection against retaliation.
- Promote zero tolerance to any criminal and other unethical or irregular conduct within TGH.

3. OBJECTIVES AND SCOPE

- 3.1. This Whistle Blowing Policy is intended to provide overall guidance for the reporting of concerns and to further encourage and enable staff to raise concerns within TGH rather than overlooking the problem or reporting such concerns through inappropriate channels.
- 3.2. Furthermore, this Whistle Blowing Policy aims to:
- Highlight the various channels available to employees of TGH to raise concerns;
 - Reassure employees that they will be protected from reprisals or victimisation for disclosures made in good faith.
- 3.3. There are existing procedures to enable employees to lodge grievances relating to their own employment, which will not be superseded by this policy and therefore the mechanisms available through this policy should not be used as an avenue to re-report issues that have already been addressed through the grievance or complaints procedures. This policy is intended to address concerns that fall outside the scope of grievance procedures, which, although not exhaustive, include the following:
- Conduct which is an offence or a breach of law;
 - Health and safety risks, including risks to the public as well as other employees;
 - Damage to the environment;
 - The unauthorised use of company resources;
 - Possible fraud and corruption;
 - Sexual harassment;
 - Other unethical conduct;
 - Serious failure to comply with appropriate professional standards;
 - Abuse of power, or use of company powers and authority for any unauthorised use or personal gain;
 - Deliberate breach of company policies and/or procedures.

4. ACTING IN GOOD FAITH

Users of the **24HRS TOLL FREE WHISTLE BLOWERS' HOTLINE** must act in good faith and must not make false accusations when reporting any concerns. Good faith is when a disclosure is made without malice or consideration of personal benefit and the complainant has a reasonable basis to believe the report to be true.

5. REPORTING CHANNELS

- 5.1. To remain in compliance with the Protected Disclosures Act, TGH will ensure protection of employees who submit a disclosure in good faith, using the appropriate channels provided by TGH.
- 5.2. As a first step, employees should normally raise concerns with their immediate manager or their superior. This depends, however, on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice.
- 5.3. If an employee is for any reason uncomfortable using the normal business channels, they should then contact the **24HRS TOLL FREE WHISTLE BLOWERS' HOTLINE**.
- 5.4. Concerns may be raised verbally or in writing. Employees who wish to make a written report are invited to use the following format:
- The background and history of the concern (giving relevant dates);
 - The reason you are particularly concerned about the situation;

- The extent to which you have personally witnessed or experienced the problem (provide documented evidence where possible).

5.5 Although you are not expected to prove beyond reasonable doubt the truth of an allegation, you will need to demonstrate to the person contacted that there are reasonable grounds for your concern.

6. SAFEGUARDS – HARASSMENT AND VICTIMISATION

- 6.1 TGH is committed to good practice and high standards and wants to be supportive of employees.
- 6.2 TGH recognises that the decision to report a concern can be a difficult one to make and is therefore committed to ensuring that an employee is protected for a disclosure made in good faith.
- 6.3 Retaliation, whether direct or indirect, by any employee of the company against anyone who, in good faith, submits a disclosure or assists those investigating the allegations will not be tolerated.
- 6.4 No employee will suffer harassment, retaliation or adverse employment consequences because of the submission in good faith of their disclosure. Any employee of the company, who retaliates against a person who has submitted a disclosure pursuant to this policy in good faith, shall be subject to disciplinary action.

7. DEFINITION OF A DISCLOSURE

- 7.1 A disclosure is a reported concern that has been submitted by an employee, contractor or external stakeholder acting in good faith using the **24HRS TOLL FREE WHISTLE BLOWERS' HOTLINE**. It does not include issues or concerns raised by employees through normal business channels in an open, non-confidential manner. All disclosure reports will be treated in confidence.
- 7.2 To enhance the confidentiality of the system, TGH has chosen to outsource the management of the **24HRS TOLL FREE WHISTLE BLOWERS' HOTLINE** and has selected and contracted an independent specialist external provider namely, Whistle Blowers. Disclosures will be handled in a secure environment by Whistle Blowers by professionally trained personnel.

8. REPORTING AND RECORDING OF DISCLOSURES

- 8.1 Users of the **24HRS TOLL FREE WHISTLE BLOWERS' HOTLINE** can report their disclosures using any one of the following mediums of communications:
- TOLL FREE NUMBER: **0800 225 226**
 - SMS SERVICE: **33490**
- 8.2 Disclosures will be received by Whistle Blowers, the external service provider. All reports will be provided to the designated personal within the company, however before reports are submitted to TGH, Whistle Blowers will eliminate any element that could identify the employee making a disclosure. This means that the employee will remain totally anonymous if they have chosen to use this option.
- 8.3 The identity of an employee will be provided to TGH only if the following condition is met:
- The employee has given their verbal consent to Whistle Blowers, the external service provider, to communicate their identity to TGH.

9. HOW THE COMPANY WILL RESPOND

- 9.1. TGH will respond to all disclosures made.
- 9.2. TGH will ensure the employees protection if the disclosure is made in good faith.
- 9.3. To protect individuals and those accused of misdeeds or possible malpractice, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take.
- 9.4. Where an investigation is appropriate, the matters raised will either:
 - Be investigated internally by management, internal audit, or through the disciplinary process.
 - Be referred to an independent outside service provider with the necessary specialist expertise and experience in dealing with the type of disclosure made. This will be reviewed on a case-by-case basis.
- 9.5. Some concerns may be resolved by agreed action without the need for formal investigations. If urgent action is required, this will be taken before any investigations are conducted.
- 9.6. The investigation and the duration thereof will depend on the nature of the matters raised, the difficulties involved, and the clarity of the information provided. If necessary, further information will be sought from the individual if this is possible.
- 9.7. The investigations will be handled in a confidential manner and will not be disclosed or discussed with any persons other than those with a legitimate right to such information.

10. THE RESPONSIBLE OFFICER

The Chief Operating Officer (COO) has overall responsibility for the maintenance and implementation of this policy. This Officer maintains a record of concerns and the outcomes (but in a form which does not endanger your confidentiality) and will report as necessary to the Group Chief Executive Officer (Group CEO).

11. CREATING AWARENESS

For the Policy to be sustainable, it will be supported by a structured communication and awareness program as part of TGH's broader fraud risk management strategy.

12. CONTACT DETAILS

Requests for further information should be referred to the Group CEO – Neresh Pather nereshp@traction.co.za



Neresh Pather Pr. Eng
Group Chief Executive Officer
3 December 2024

24HRS TOLL FREE WHISTLE BLOWERS' HOTLINE

TOLL FREE NUMBER: 0800 225 226

Or

SMS SERVICE: 33490



WHISTLE BLOWERS

This is to certify that

Enza Construction

(MEMBERSHIP NUMBER: 01102016/ENZ2016)

has implemented Whistle Blowers (Pty) Ltd as their external
independent whistle blowing hotline service provider.

Whistle Blowers (Pty) Ltd is an independent subscription service, designed to provide
employees at Enza Construction with the means to anonymously "blow the whistle" on fraud,
criminal and unethical activity and any other irregularities in the workplace.

Enza Construction promotes ethics and honesty in the workplace.


Managing Director

1 October 2016

Date



Certificate
PROMOTING ETHICS AND HONESTY IN THE WORKPLACE