

# Whistle Blowing Policy

v2 | updated November 2025



## 1. Introduction

This Policy is in terms of the Protected Disclosures Act 26 of 2000.

The scope of this policy is applicable to New National Assurance Company Limited (NNAC) as a legal entity and as controlling company to which it has interests and participation in its subsidiaries.

NNAC and every employee have a responsibility to disclose criminal and other irregular conduct in the workplace.

Our Company has a responsibility and will take all necessary steps to ensure that employees who disclose such information are protected from any reprisals as a result of such disclosure.

## 2. What is a disclosure?

A disclosure means revealing or divulging information regarding any conduct of an employer or employee, made by another employee who has reason to believe that the information concerned tends to show one or more of the following:

- (a) That a criminal offence has been committed, is being committed or is likely to be committed.
- (b) That a person has failed, is failing or is likely to fail to comply with any legal obligation to which that person is subject.
- (c) That a miscarriage of justice has occurred, is occurring or is likely to occur.
- (d) That the health or safety of an individual has been, is being or is likely to be endangered.
- (e) That the environment has been, is being or is likely to be damaged.
- (f) Unfair discrimination in terms of the Promotion of Equality and Prevention of Unfair Discrimination Act of 2000; or
- (g) That any of the matters referred to in paragraphs (a) to (f) above, has been, is being or is likely to be deliberately concealed.

## 3. Avenues available for making a protected disclosure.

Criminal conduct or malpractices may be disclosed to:

- (a) The employee's direct line Manager.
- (b) The employee's Head of Department.
- (c) Head of Legal Department; or
- (d) any member of our Executive Management team.
- (e) A designated telephone line for Whistle blowing.

It is the employee's responsibility to act in a responsible and honest manner without motive to gain any personal advantages from making the disclosure.

A designated Fraud & Ethics Hotline has been connected for any criminal conduct or malpractices to be reported anonymously. The contact details are as follows:

- Contact Number: 0800 111 832
- WhatsApp Number: 0860 004 004
- Dedicated Email Address: [NNAC@behonest.co.za](mailto:NNAC@behonest.co.za).

At the end of each month a report is generated recording any activity on that line.



#### **4. Duty of New National Assurance Company Limited**

We will not subject an employee to an occupational detriment, meaning the employee will not as a result of, directly or indirectly making a protected disclosure be:

- (a) Subjected to disciplinary action.
- (b) Dismissed, suspended, demoted, harassed, or intimidated.
- (c) Transferred against his or her will.
- (d) Refused a promotion or transfer.
- (e) Subjected to a term or condition of employment or retirement which is altered or kept altered to his or her disadvantage.
- (f) Refused a reference or given an adverse reference.
- (g) Denied appointment to any employment or profession.
- (h) Threatened with any of the actions referred above; or
- (i) Otherwise adversely affected in his or her employment, profession, employment opportunities and work security.

#### **5. Remedies available to the Employee**

Should an employee be subject to an occupational detriment, the employee may:

- (a) Approach any court having jurisdiction for protection.
- (b) Rely on the provisions of the Labour Relations Act.
- (c) Request, if reasonably possible or practicable, to be transferred from the position occupied when the disclosure was made to another position in the same division or another division on terms and conditions that may not without his or her consent be less favourable than those immediately before the transfer.