



GROUP WHISTLE-BLOWING POLICY

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| Policy Owner Contact Information | Email: yondela@barloworld.com Tel: 011 445 1045 |
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APPROVAL AND OWNERSHIP

| Policy Owner | Date |
|--------------------------------------------------|----------------|
| Executive: Ethics and Compliance – Yondela Ndema | 1 October 2022 |

| Approved By | Date |
|---------------------------------------------------|-------------------|
| Executive Committee | 12 September 2022 |
| Group Social, Ethics and Transformation Committee | 22 September 2022 |
| The Barloworld Limited Board | 23 September 2022 |

REVISION HISTORY

| Version | Revision Date | Description | Next review Date |
|----------------|----------------------|---------------------------------------------------------------------------------------|-------------------------|
| V1.0 | 2015 | First edition of the Barloworld Global Whistle-blowing Policy | 2020 |
| V2.0 | 2020 | Change of ownership, added detailed investigation process | 2022 |
| V3.0 | 2022 | Review in terms of the two-year review board matrix and to incorporate audit findings | 2024 |

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DEFINITIONS AND ABBREVIATIONS

Table 1: Definitions

| Terminology | Description |
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| Case Management System (CMS) | means a cloud tool provided by the Whistle-blowing Facility used for receiving, allocating, monitoring, reporting, and storing documentation on the whistle-blowing cases. |
| Employee | means an Employee as contemplated in the Protected Disclosures Act, namely: <ul style="list-style-type: none"> • any person, excluding an independent contractor, who works or worked for the Group and who receives or received, or is entitled to receive, any remuneration; and • any other person who in any manner assists or assisted in carrying on or conducting or conducted the business of the Group. |
| GEO | means the Executive Compliance and Ethics and a Group Executive exclusively responsible for management of Group Whistle-blowing process including management of CMS from the Group side. |
| Group | means Barloworld Limited and its subsidiaries, divisions, and business units. The Barloworld Group does not include joint ventures or other independent entities governed by independent boards or trustees other than those where Barloworld Limited or any of its subsidiaries, divisions or business units exercise management control. |
| Improper Conduct | An event directly or indirectly related to the Group and/or Employee, including but not limited to: <ul style="list-style-type: none"> • an actual or suspected violation of legislation including but not limited to fraud, bribery corruption or theft. • illegal and unethical behaviour; • conduct that result in the health or safety of an individual being, or likely to be seriously threatened; • conduct that harms or is seriously likely to harm the natural environment; • conduct that unfairly discriminates against an Employee, under the laws of the country of employment; • any other actions leading to legislation violation by the Group directly or via third parties; • any other actions related to violations of Group policies and procedures; • any other actions posing serious reputational risks to the Group; • any matter referred to above that has been concealed deliberately. |
| Main Investigator (MI) | means Employee(s) appointed by the Divisional CEO and who, is responsible for conducting internal investigations in the division, and meets the following criteria: <ul style="list-style-type: none"> • organizational independence • personal objectivity • professional qualification • experience with the company • reputation and disciplinary record |

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| | <ul style="list-style-type: none"> • level of workload • ability to investigate with sensitivity, and maintain privacy and confidentiality of subjects <p>Divisional CEO can use his/her discretion to change or reinforce the MI with the other Employees for specific investigations. The factors for consideration remain the same.</p> <p>The number of MIs starts with one and depends on the size of the division and the average number of cases.</p> <p>Divisional CEO needs to approve all MIs for the division with the GEO.</p> |
| Occupational Detriment | <p>means the violation of Whistle-blower protection as defined by this Policy against the good-faith Whistle-blower whereby he/she is, for example:</p> <ul style="list-style-type: none"> • subjected to a disciplinary action; • dismissed, suspended, harassed, intimidated, or demoted; • transferred involuntarily; • refused a transfer or promotion; • subjected to conditions of employment or retirement that were changed to his/her disadvantage; • refused a reference, or given an adverse reference; • denied an appointment to an adequate service or position; • otherwise adversely affected or discriminated in respect of his/her service or position, including employment conditions, opportunities, and work security etc. • put under physiological pressure or threats; • disclosure of the Employee's Whistle-blowing call report to other Employees and/or third parties. |
| Protected Disclosures Act | means the Protected Disclosures Act, No. 26 of 2000, as amended from time to time. |
| Whistle-blower | means an Employee, any other person reporting Improper Conduct to the Group via both the Whistle-blowing Facility, or walk-in reporting directly via management. |
| Whistle-blowing Facility (WF) | means the authorized independent reporting channel managed by a third party (currently - Deloitte Tip-Offs Anonymous), particulars of which are included in Annexure A. |

Table 2: Abbreviations

| Abbreviation | Description |
|----------------|--------------------------------------------------|
| Divisional CEO | Chief Executive Officer of a particular Division |
| Group CEO | Group Chief Executive Officer |
| Group FD | Group Finance Director |
| GEO | Executive Compliance and Ethics |

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1 Preamble and Policy Summary

Barloworld Group is committed to maintaining the highest standards of honesty, integrity and ethical conduct and recognizes that whistle-blowing process plays an important role in achieving these objectives.

The Group provides an independent Whistle-blowing Facility for reporting all cases of Improper Conduct.

The Group does not tolerate any unethical or illegal conduct and committed to conduct fair and unbiased investigations of all cases of reported Improper Conduct.

2 Purpose & Objective

The Policy deals with the management of Whistle-blowers' reports of Improper Conduct including a proper investigation and resolution thereof to ensure prompt response, prevent recurrence and improve internal controls.

3 Scope

This Policy applies to:

- a) all Employees of all the companies within the Group
- b) all natural and legal entities performing services for or on behalf of the Group
- c) all Whistle-blowers
- d) all third parties, who conduct an independent investigation for and on behalf of the Group.

The Policy applies to all situations when the Group receives information on potential Improper Conduct from Whistle-blowers in accordance with the definitions of this Policy. The Policy covers both Whistle-blowing Facility and walk-in reporting made directly to Barloworld management in accordance with para 5.1.1 of this Policy.

4 Roles and Responsibilities

Executive management has the responsibility to ensure compliance with this policy and the discretion to define the processes, procedures, and other mechanisms by which the policy is implemented.

5 Policy Statement

5.1 Reporting Channels

5.1.1. The Group expects all Employees to report any circumstance or action that falls or appears to fall under the definition of Improper Conduct via any channel that the Whistle-blower trusts most:

- a) his/her supervisor
- b) division Top management
- c) any Group Top management

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- d) the Whistleblowing Facility

The Policy equally applies to all reports received via any of the methods above.

To the extent that a Whistle-blower is not an Employee (and is an external third party such as a customer or supplier), such reports must be routed by the MI to the divisional legal counsel, to ensure that the report and its contents are reviewed for legal / contractual risks before addressing the report and agreeing to proceed with an investigation.

- 5.1.2. The Whistle-blowing Facility allows for anonymous reports 24 hours a day, 7 days a week for reporting of any Improper Conduct. The Whistle-blower has the right to choose the level of their own confidentiality:
 - a) remain fully anonymous
 - b) disclose his/her identity/contact details to the Whistle-blowing Facility only
 - c) disclose his/her identity/contact details to the Whistle-blowing Facility and to the GEO

While the Group respects any choice from the Whistle-blowers and will treat the reports with equal attention, when Whistle-blowers provide contact details, it significantly improves the effectiveness of the investigation as it provides MIs with the opportunity to ask for further information or clarification, when necessary.

In circumstances where the Improper Conduct is of a pertinent personal and sensitive nature it may not be possible to fully investigate a report without the Whistle-blower providing their details e.g., allegations of discrimination etc.

- 5.1.3. Any reports made, whether chosen to be anonymous or not, should include as much detail as possible evidencing the Improper Conduct, in order to allow the Group to investigate the matter appropriately. Examples of important details may include:
 - a) the names of the people involved in the incident(s)
 - b) the names of the witnesses to the incident (s)
 - c) the dates and times of the incident(s) approximate or exact
 - d) IT systems that may contain the trail of evidence
 - e) references to specific documents, transactions, or counterparties
 - f) pictures or print screens from any type of devices
 - g) explanation of why the person believes the incident(s) constitutes Improper Conduct and should be reported
 - h) Any other relevant information (which should be based on facts not rumours).

As much as the Group is committed to full investigation of all reports, insufficient detail may result in an inability for the Group to address the matter appropriately.

- 5.1.4. Any Employee who believes that they may have been personally involved in misconduct or a policy violation is still expected to report such incidents. Self-reporting will be considered as an important mitigating factor when deciding whether or what disciplinary action is appropriate. Conversely, the failure to self-report may be considered as a serious aggravating factor.

5.2 Co-operation

- 5.2.1. All Employees are required to fully cooperate with MIs or any other designated investigators by providing full, timely and truthful information. Any person, who fails to cooperate with a Group investigation or intentionally provides false or misleading information in Group

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investigations, will be subject to disciplinary action, which may result in termination of employment and may be subject to other applicable legal liability.

5.3 Confidentiality

- 5.3.1. Confidentiality is important for protecting Whistle-blowers, the integrity of evidence and the effectiveness of the investigation itself. While the Group cannot guarantee confidentiality in every circumstance, it will make all reasonable efforts to protect the identity of all Whistle-blowers.
- 5.3.2. All information received from the Whistle-blower will be managed in accordance with this Policy and applicable data protection legislation, treated in the strictest of confidence, and will only be disclosed to the extent necessary for the purposes of investigating the allegations or as required by law.
- 5.3.3. For each investigation undertaken, the Group will require the MI (and any other members of an investigation team), those Employees interviewed and other witnesses, including the Whistle-blower not to disclose or discuss the matter with anyone (whether inside or outside the Group), who is not authorized to receive information relating to the investigation, and especially with the person under investigation or his/her management and associated persons and to maintain full confidentiality which may include the requirement to sign non-disclosure agreements.

5.4 Whistle-blower Protection

- 5.4.1. The Group provides Whistle-blower Protection and does not tolerate any forms of Occupational Detriment against Whistle-blowers for reporting of Improper Conduct.

However, Whistle-blower Protection applies only to the situations when at least one point from BOTH A and B is true:

- A. Whistle-blower made a disclosure in good faith to:
 - i. The management of the Group or any Group company (any person in a supervisory position) in accordance with the existing grievance procedure in the particular company within which the Whistle-blower is engaged; or
 - ii. Where a Whistle-blower reasonably believes that the grievance procedure is not the appropriate medium, to Executive: Compliance and Ethics or
 - iii. To the Group's confidential and independent external Whistle-blower Facility
- B. Under the following circumstances:
 - i. Whistle-blower honestly and reasonably believes that the disclosed information and any allegations contained therein are substantially true;
 - ii. Whistle-blower does not disclose the information for personal gain (excluding any reward payable in terms of legislation); and
 - iii. Whistle-blower does not disclose the information for a malicious cause.

If malicious and/or false allegations are deliberately made in bad faith by an Employee, that Employee: (i) will not be subject to Whistle-blower protection; (ii) may be subjected to

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disciplinary action, which may include dismissal; and (iii) may be subjected to other potential legal liability.

5.5 Information Access and Evidence Preservation

- 5.5.1. GEO must authorize MI to gain unrestricted access to all the information relevant to the investigation. MI must report any information restrictions to the GEO and mention them in the report.
- 5.5.2. Employees who have been informed or become aware of ongoing investigations for which they have potentially relevant records (i.e., email, instant messages, files, notes, photographs, recordings, etc.) must retain these records and provide them to the Group. Any person who knowingly interferes with an investigation or destroys potentially relevant records or information will be subjected to disciplinary action, which may result in termination of employment and may be subject to other applicable legal liability.

5.6 Ethics Investigation

- 5.6.1. An ethics investigation involves several major steps and is triggered by a whistle-blowing message received via any of the channels in para. 5.1.1 above.

If the report is received outside the Whistle-blowing Facility, it must be captured on CMS by division's designated users.

- 5.6.2. **Allocation of the Call** – GEO must allocate the call report via CMS to the Division in which the alleged unethical conduct occurred. MIs will be assigned as the only users of the CMS and therefore, the information on the allocated call reports is shared only with MIs .

Any information on the call reports received out of the WF, is also shared only with MIs for input to CMS and taking further steps on the investigation.

Any delays in sharing the information or disclosure of the information with the other Employees are considered a material breach of this Policy.

In instances where the call report contains allegations of sexual harassment, of a complex, high risk or sensitive nature, the GEO must ensure that the matter be referred for an external and independent investigation. In that case, GEO may assign the call report to a different MI / party in agreement with the Ethics Champion.

- 5.6.3. **Investigation Proposal** – The investigator must be prepared to conduct a comprehensive, objective, fair and professional investigation. The planning needs to be flexible to accommodate new information and developments. The investigation proposal must address a minimum of the following issues and questions:
 - a) Key allegations to be investigated;
 - b) The Employees and other parties, who are the subject of the investigation;
 - c) Which individuals or witnesses might have the knowledge/facts;
 - d) What law, Barloworld Policies or other business requirements may have been violated;
 - e) Is the Improper Conduct an isolated incident or a systematic problem;

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- f) What documents/information is required for each allegation and the potential sources thereof; and
- g) What post investigation steps are needed.

5.6.4. **Review of the Investigation Proposal** - GEO will review the investigation proposal and respond to the MI indicating whether the investigation proposal is accepted or rejected, with proposed amendments and points of clarity.

5.6.5. **Investigation** – Once the investigation is completed, the investigator will prepare a final report in line with the investigation report template in Annexure B, including details of the investigatory steps taken and factual findings, root cause analysis, control / process improvements, conclusions, and recommendations. The report will be retained in a confidential file with limited access for the appropriate retention time as required by law and policy.

Employees who are witnesses to the investigation, including the Whistle-blower and the named/alleged perpetrator who was the subject of the investigation, will not be entitled to view or obtain a copy of the investigation report. The investigation report will be for the specific purposes of the Group record keeping.

5.6.6. **Review of the Investigation Report** – GEO will review the investigation report and provide feedback to the MI, whether the investigation report is accepted or rejected with the proposed amendments and points of clarity. The Investigation report must address all allegations raised in the call report, with findings and corrective actions, where applicable, for each allegation.

5.6.7. **Implementation of Remedial Action** – The Division must implement remedial action pursuant to the approval of the investigation report by the GEO. Where possible and practicable, the Group will pursue full recovery of all losses resulting from Improper Conduct.

5.6.8. **Closure of the Call Report** – The Division may under no circumstances close a call report CMS that was allocated to them.

Only GEO can close the call report on CMS, which will be confirmed when all reported allegations have been assessed, appropriate investigation steps have been taken, no further appropriate investigation steps are reasonably practicable, and an outcome including remediation measures and lessons learnt, where applicable, has been sufficiently initiated and documented.

5.6.9. **Extension of timelines:** In some cases, the investigation procedures require more time. MI may send a motivation and extension request to GEO. The extension is considered granted only after the approval from GEO.

5.7 Investigation Guidelines

5.7.1. The Group will investigate all facts to objectively determine if Improper Conduct took place. All investigators will treat witnesses in a professional manner, with dignity and respect. No investigator will engage in any potential non-compliant conduct that would amount to a breach of any Barloworld Policies, including the Barloworld Worldwide Code of Conduct and no investigator will knowingly provide any witness with false information during an investigation.

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5.7.2. Reasonable Basis to Investigate

Not every allegation of misconduct will be investigated – there must be a reasonable basis to investigate when BOTH A and B below are true:

- a) The GEO reasonably believes that the facts presented are sufficient to suggest that an incident of Improper Conduct may have occurred; and
- b) There is a reasonable factual basis to prove or disprove that Improper Conduct may have occurred.

In addition to the above conditions, GEO may determine that a call report does not merit an investigation in consultation with the divisional Ethics Champion, for example:

- a) Investigating a potential Improper Conduct would cost more than the potential loss caused by it;
- b) The call report is a misunderstanding of a Barloworld policy or the purpose of Barloworld Whistle-blowing Facility;
- c) The substance of the call report does not relate to Improper Conduct and can be resolved informally, such as a request for assistance or customer service;
- d) The call report relates to a lack of communication or feedback between the Whistle-blower and a person not associated with Barloworld;
- e) The same or similar issues were previously raised and investigated and no significant new information was provided in the call report while there was an internal control improvement which is relevant to the situation described in the call report;
- f) The reported allegations lack sufficient factual clarity and detail to enable an assessment, and investigation and additional details are not available because the Whistle-blower chose to be anonymous;
- g) No additional details have been provided to the Whistle-blowing Facility despite reaching out to the Whistle-blower for further details and the provided facts are not sufficient to start the investigation;

A report is made when another formal process is being introduced, is imminent, or is underway or addresses the issue being reported.

5.7.3. Internal Investigation

When the MI or other persons are assigned as the investigation team, they should have no personal or vested interest related to the outcome of the specific case.

Investigators should apply sound investigation procedures to determine, by witness interviews and review supporting documentation, system transactions or other relevant information about the person who was involved in the alleged incident(s), including potential witnesses, what the alleged incident(s) was and the policies that are potentially relevant, when the alleged incident(s) occurred and, if a violation occurred. Where the identity of the Whistle-blower is not anonymous, he/she must be interviewed as part of the investigation.

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5.7.4. External Investigation

A matter may be outsourced to external investigation depending on the following:

- a) nature, scope, and complexity of allegations;
- b) allegations that pose a reputational risk and depending on the issues involved, must be protected under legal privilege; and
- c) it involves senior management or executives of Barloworld.

Full or partial use of a third party for the investigation must be pre-approved by GEO in the investigation plan.

5.7.5. The Right to Respond

Person under investigation may be reasonably provided with an opportunity to respond to the allegations if ALL the following conditions are true:

- a) All investigation procedures are completed, and all facts have been gathered, copied and documented;
- b) Investigators agree that the call report is at least partially true;
- c) Disclosure does not and will not compromise the whistle-blower protection or other requirements of this Policy in the future; and
- d) GEO approval is received for the interview with the person under the investigation.

If the perpetrator denies the allegations, he/she should be offered an opportunity to explain the situation and his/her innocence by submitting any evidence to corroborate his/her version. Even if the weight of the information uncovered tends to substantiate the allegation, the investigation is not over until the alleged perpetrator is given an opportunity to respond to information and evidence gathered.

5.8 Investigation Outcome

- 5.8.1. The evidentiary analysis in the investigation report must bring together all documentary, physical, and testimonial facts relating to the allegations to reach a conclusion to prove or disprove the allegations.

In addition, each investigation report should have a conclusion and a short executive summary of findings.

- 5.8.2. The investigator must determine if the allegation of Improper Conduct is true, and there are three possible outcomes:

Substantiated – status is valid when the evidence mostly supports the allegation in full or in key parts.

When this is determined to be the finding of an allegation, corrective action relating specifically to that allegation must be taken or the request for closure by the Main Investigator will be denied.

In instances, when a substantiated finding constitutes a criminal offence, this may trigger a potential reporting obligation to a regulatory body.

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Unsubstantiated – status is valid when (i) the evidence mostly supports the conclusion that the alleged Improper Conduct did not occur; (ii) the available evidence is insufficient to conclusively prove that the allegation was true.

Corrective action may still be undertaken where the investigation revealed deficiencies in internal controls or processes notwithstanding an unsubstantiated finding.

Inconclusive – an inconclusive finding is valid in rare instances where the investigator simply cannot complete the investigation or come to a clear conclusion, for example because the perpetrator has left the employ of Barloworld, unavailability of witnesses and documents etc.

5.9 Disciplinary Action Resulting from the Investigation

5.9.1. The Group recognizes that appropriate and adequate disciplinary actions based on substantiated Whistle-blowing call reports are key to building an effective and healthy internal control environment and allow to achieve the following important results:

- a) Identify Improper Conduct in the Group
- b) Minimize losses and reputation damage to the Group
- c) Improve internal control environment
- d) Reinforce Employee trust in whistle-blowing
- e) Deter new cases of Improper Conduct
- f) Demonstrates imminent corrective action against all misconduct
- g) Boost Employee discipline

5.9.2. Conversely, having weak or no disciplinary actions after clearly substantiated cases of Improper conduct have harmful negative effect on the control environment.

5.9.3. Therefore, anyone, regardless of position or title, who is proven to have engaged in substantiated Improper Conduct, will be subjected to disciplinary action, which, dependent on the facts and seriousness of the matter, may include termination of employment at the discretion of the Group in accordance with the existing Barloworld disciplinary procedures. Additionally, the Group reserves the right to pursue criminal and/or civil action(s) for wrongdoing where appropriate.

5.10 Monitoring and Follow-up

5.10.1. GEO will provide regular reports on the whistle-blowing process, including WF and investigations activity to the Group Executive Management and relevant Committees of the Board.

5.10.2. If the Group determines that there is a reasonable basis to believe that a local law or regulation has been violated, it will make a determination as to whether it must report that matter to a regulatory authority and, if so, will make efforts to report the matter in a timely manner.

5.10.3. The Whistle-blower will be provided with feedback on the outcome of the case, which will be communicated to the Whistle-blowing Facility, which he/she can access using a reference number that was obtained when the call report was logged. The feedback to the Whistle-

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blower will be limited to whether the call report was substantiated or not, management action taken, and that the call report is closed.

5.11 Guidelines When Facing Retaliation or Victimization Following a Whistle-blowing Report

The Group provides Whistle-blower Protection and does not tolerate any forms of Occupational Detriment against Whistle-blowers for reporting of Improper Conduct. In the event that an Employee believes they are facing any form of retaliation as a result of making a whistle-blowing report, the Employee must report this via whichever channel the Whistle-blower trusts most:

- a) his/her supervisor
- b) division Top management
- c) any Group Top management
- d) the Whistle-blowing Facility

The Policy equally applies to all reports of retaliation received via any of the methods above.

6 Communication

This policy must be communicated to all employees along with the division specific requirements contemplated in this policy. Each division is responsible to determine the format of the training and nature of records kept albeit that the division must ensure that employees are aware of this policy and the division specific requirements for declaring and managing conflicts.

7 Related Policies & Other Documents

| Document Name |
|------------------------------------------------------------------------------------|
| Group E&C Policies |
| All Group Policies and Regulations relevant to a specific case of Improper Conduct |

8 Raising Concerns and Seeking Guidance

If any person becomes aware of a circumstance or action that violates or appears to violate this policy on bribery and corruption, they are encouraged to contact their manager, the Group General Counsel, the Group Compliance Manager, or alternatively the Barloworld Ethics Line at www.tip-offs.com.

The Barloworld Ethics Line is an independent and confidential system for reporting allegations of unethical behaviour, illegal actions, or actions that violate the Barloworld Worldwide Code of Conduct.

The Barloworld Global Whistleblowing Policy applies to the use of the Barloworld Ethics Line, and it contains the contact details pertaining to each company, division, or business unit.

Barloworld is committed to ensuring that no employee suffers any occupational detriment as a result of reporting a genuine concern in good faith.

9 Breach of Policy

Failure to comply with this Policy could amount to gross misconduct and/or a material breach of the contract of employment, and this may result in disciplinary action in line with the applicable Barloworld disciplinary codes and/or fines or penalties in terms of applicable laws.

10 Deviations from Policy

It is the responsibility of the executive management to ensure that this policy is adopted and approved by an appropriate executive committee.

Any deviations to this Barloworld policy that amend the meaning or raise the minimum standard of the group policy requirements must be pre-approved in writing by the Policy Sponsor. Once approved, such deviations must be tabled, approved and recorded at an appropriate executive meeting.

Any deviations that add more specific requirements, and therefore raise the minimum standard required by this Barloworld policy, may be included at the discretion of executive management and then tabled, approved and recorded at an appropriate executive meeting.

Language translations of Barloworld policies must be conducted or checked by a professional language translator to avoid translation errors that may change the meaning of the policy requirements.

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ANNEXURE A – WHISTLE-BLOWING FACILITY CONTACT DETAILS

| Barloworld Ethics Line – administered by an Independent Service Provider | |
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| Within South Africa | <ul style="list-style-type: none"> ▪ Free Calls: <ul style="list-style-type: none"> 0800 203 242 - Barloworld Logistics 0800 003 248 - Barloworld Corporate 0800 004 825 - Barloworld Equipment 0800 004 832 - Barloworld Motors 0800 121 282 - Barloworld Motors ▪ SMS (Text messaging) (SA Only) <ul style="list-style-type: none"> Text: "Please Call Me" to 32840 ▪ Fax: (031) 560 7394 ▪ Free Fax: 0800 00 77 88 ▪ Internet website: www.tip-offs.com (Online Reporting) ▪ E-mail: <ul style="list-style-type: none"> pi@toanon.co.za barloworld@ethics-line.com ▪ Free Post (SA only): KZN 138, Umhlanga Rocks, 4320 |
| Outside South Africa | <ul style="list-style-type: none"> ▪ +27 (31) 571 5633 ▪ E-mail: <ul style="list-style-type: none"> barloworld@ethics-line.com ▪ Internet website: www.tip-offs.com (Online Reporting) ▪ Postal Address: P.O. Box 774, Umhlanga Rocks, 4320 |
| Barloworld Ethics Line – administered by an Independent Service Provider | |
| Botswana | <ul style="list-style-type: none"> ▪ Free Call: <ul style="list-style-type: none"> 0800 600 644 (Tollfree from BTC) 7111 9496 (Tollfree from Mascom) |

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| | <p>1144 (Tollfree from Orange)</p> <ul style="list-style-type: none"> ▪ E-mail: barloworld@ethics-line.com ▪ Internet website: www.tip-offs.com (Online Reporting) ▪ Postal Address: P.O. Box 774, Umhlanga Rocks, 4320 |
| Namibia | <ul style="list-style-type: none"> ▪ Free Call: 0800 001 126 (Tollfree from Namibia Fixed Lines) 91847 (Tollfree from MTC) ▪ E-mail: barloworld@ethics-line.com ▪ Internet website: www.tip-offs.com (Online Reporting) ▪ Postal Address: P.O. Box 774, Umhlanga Rocks, 4320 |
| Barloworld Ethics Line – administered by an Independent Service Provider | |
| Vostochnaya Technica Russia | <ul style="list-style-type: none"> ▪ Free Call: 810 800 253 31012 ▪ Email: vost-tech@ethics-line.com ▪ Internet website: www.tip-offs.com (Online Reporting) ▪ Postal Address: P.O. Box 774, Umhlanga Rocks, 4320 |
| Barloworld Ethics Line – administered by an Independent Service Provider | |
| Angola | +244941022880 - Accessible from Unitel and Movitel and all other fixed lines at normal national rates within Angola. |
| Lesotho | Toll Free: 80022055 (Econet) |
| Malawi | Toll Free: 847 - Available from Airtel (ZAIN), TNM |

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| Mozambique | 800112233 - Toll free access from TDM fixed lines 800 333 312 - Tollfree access from Vodacom only |
| United Kingdom | 08081013460 - Toll-free access from fixed line; accessible from mobile networks; mobile rates may be applicable |
| Swaziland | 8007006 - Toll free access from the SPTC network only |
| Zambia | +260-971231250 – Tollfree access from Airtel |

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ANNEXURE B - INVESTIGATION REPORT TEMPLATE

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| Introduction | Date of the Investigation Report: |
| | Investigator: [Name and role] |
| | Background to the investigation: [Brief overview of the matter/summary of allegations and cite reference number of the Tip-Offs Anonymous call report. Include the date of the incident, the date on which it was reported, the date on which investigators were assigned to it, and the date on which the investigation closed.] |
| | Executive Summary: Summary of facts and findings |

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| Process of investigation | Investigation Timeline |
| | Evidence collected: [List all evidence collected, evidence submitted by the whistle-blower, including specific Barloworld policies considered relevant based on the facts. Include information such as written statements, any relevant emails, texts, voice mails, and photographs.] |
| | Evidence not collected: [List all evidence that could not be collected, if any, and why] |
| | Persons interviewed [List all people interviewed and their respective roles and title at Barloworld/third party. Include the names and roles of others present; the location and date of interview(s).] Note: The alleged perpetrator should be reasonably provided with an opportunity to respond to the allegations and assist the investigation to establish his/her innocence by submitting any evidence to corroborate his/her version where he/she denies the allegations. |
| | Persons not interviewed: [List any witnesses that could not be interviewed, if any, and why] |

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| The investigation findings | Summary of written and physical evidence: [Name and summarise each document considered, set out how the evidence supported or did not support your findings and why] |
| | Summary of witness evidence/testimonies: [Name and summarise each witness statement, quote from statement where relevant, set out how the witness statement supported or did not support your findings and why] |
| | Facts established: [Detail what the investigation has established] |
| | Facts that could not be established: [Detail any part of the investigation that was inconclusive] |
| | Other relevant information: [Detail any other information that is relevant to the matter] |

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| Conclusion [if required] | Outcome of Investigation: <ul style="list-style-type: none"> • Substantiated • Unsubstantiated • Inconclusive |
| | Recommendation: Formal action in line with the Barloworld Disciplinary Codes/Improvement of controls/Informal action/No action required Further details on recommendation: [Such as the type of action suggested for example, formal disciplinary meeting, and if there are any other recommendations related to the matter. In disciplinary matters, the investigator should not recommend a possible sanction. This should only be considered at a disciplinary hearing] |
| | Investigator's signature: Date: |

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| Supporting documents | [List all documents collected as part of investigation and included in report] |
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