

WHISTLEBLOWER POLICY

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1. INTRODUCTION

The WHL Group is committed to conducting business with integrity and honesty and encourages a culture of intolerance to wrongdoing and speaking up when any wrongdoing is encountered, so that appropriate action can be taken.

This Whistleblower Policy aims to facilitate and maintain an environment in which any concerns relating to wrongdoing can be safely and confidently expressed, without fear of punishment or unfair treatment, and ultimately assist in preventing wrongdoing within the WHL Group.

2. PURPOSE

The purpose of this Policy is to provide guidance to eligible individuals who are aware of any criminal conduct or other wrongdoing (defined as Improper Conduct in this Policy) on:

- Who can make a disclosure under this Policy;
- The types of disclosures that may be made;
- How to make a disclosure under this Policy;
- How matters disclosed will be investigated; and
- How the confidentiality of a Whistleblower's identity will be safeguarded and how the Whistleblower will be protected.

3. APPLICATION OF POLICY

This Policy applies across the entire WHL Group worldwide.

As the WHL Group has operations and staff in multiple countries, this Policy is subject to the whistleblower laws that apply in each particular country. As a result, the scope of this Policy and the manner in which disclosures made under this Policy are handled, may differ according to the laws and requirements in the jurisdiction in question. Where there is a variance between this Policy and the legal requirements of a particular jurisdiction, the more rigorous standard will apply.

In particular:

- refer to Schedule 1 of this Policy for disclosures made in terms of the *South African Companies Act*; and
- refer to Schedule 2 of this Policy for disclosures that are made under the *Australian Corporations Act 2001*.

This Policy does not apply to concerns that can be dealt with in terms of the WHL Group's Grievance Policy for which formal grievance procedures are in operation. This Policy focuses on concerns that fall outside the scope of the grievance procedures unless the grievance relates to a concern about any Improper Conduct.

4. DEFINITIONS

Australian Entities	means DJ and CRG (and each will be an Australian Entity);
Companies Act	means the Companies Act, No 71 of 2008, as amended, of South Africa;
CRG	means Country Road Group Pty Ltd and its subsidiaries;
DJ	means David Jones Pty Limited and its subsidiaries;
Improper Conduct	means the conduct described in section 6 of this Policy;
Whistleblower	means any person referred to in section 5 of this Policy who makes a disclosure or raises a concern relating to Improper Conduct in accordance with this Policy or a person who makes a disclosure of a type referred to in the Companies Act as set out in Schedule 1 to this Policy;
WHL	means Woolworths Holdings Limited;
WHL Group	means WHL, WSA, DJ and CRG;
WSA	means Woolworths (Pty) Ltd.

5. WHO CAN MAKE A DISCLOSURE UNDER THIS POLICY?

The following are eligible to make a disclosure under this Policy:

- (a) an employee of a member of the WHL Group;
- (b) a person who provided services to a member of the WHL Group while being employed by a supplier, a business partner, an independent contractor, consultant, agent or a temporary employment service (labour broker); and
- (c) any person referred to in Schedule 1 or Part A of Schedule 2 to this Policy.

6. WHAT IS IMPROPER CONDUCT?

Improper Conduct is conduct that a person has reason to believe shows that an entity in the WHL Group has engaged in one or more of the following:

- (a) a criminal offence has been committed, is being committed or is likely to be committed;
- (b) a person has failed, is failing or is likely to fail to comply with any legal obligation to which that person is subject;
- (c) the health or safety of an individual in the workplace has been, is being or is likely to be endangered;
- (d) the environment has been, is being or is likely to be damaged;
- (e) any matter referred to above has, is being or is likely to be deliberately concealed; and

(f) any other matter referred to in part 2 of Schedule 1.

Additional matters that will be considered Improper Conduct in so far as they relate to an Australian Entity are set out in Part B of Schedule 2.

7. HOW TO MAKE A DISCLOSURE

Any person referred to in section 5 of this Policy, who genuinely and reasonably believes he/she has knowledge of Improper Conduct and who wishes to make a disclosure or raise a concern relating to such conduct, may do so anonymously or confidentially in any one of the following ways:

- (a) to the independent whistleblower facilities, details of which are provided in the box insert below; or
- (b) if the concern relates to WHL or WSA the Whistleblower may also make the disclosure to:
 - (i) the Group Fraud Manager at Tip-Offs@woolworths.co.za; or
 - (ii) if the concern relates to Improper Conduct that pertains to the Fraud Manager then the Whistleblower may make the disclosure to the Group Company Secretary at governance@woolworths.co.za; or
 - (iii) further external bodies set out in part 2 of Schedule 1; or
- (c) if the concern relates to DJ or CRG, the Whistleblower may also make the disclosure to:
 - (i) the Australian Company Secretary by email at companysecretary@davidjones.com.au;
 - (ii) any officer or senior manager of DJ or CRG as the case may be; or
 - (iii) an auditor, or a member of an audit team conducting an audit, of DJ or CRG or a related body corporate, as the case may be; or
 - (iv) an actuary of DJ or CRG or a related body corporate, as the case may be; or
 - (v) further external bodies set out in part E of Schedule 2.

AUSTRALASIA HOTLINE (available 24 hours, 7 days a week)	
Australian Hotline:	1800 504 994
New Zealand Hotline	0800 005 156
E-mail:	countryroad@tip-offs.com and davidjones@tip-offs.com
SOUTH AFRICA HOTLINE (available 24 hours, 7 days a week)	
Fraud Hotline:	0800 20 25 92
Free Fax:	0800 00 77 88
E-mail:	e-mail@tip-offs.com
Postal address:	Deloitte Tip-Offs Anonymous, P O Box 774, Umhlanga Rocks, South Africa, 4320
SMS Line:	SMS "Tip-Offs" to 32480 for a call back

The WHL Group will respect any Whistleblower that wishes to make a disclosure on an anonymous basis. However, a disclosure made on an anonymous basis may hamper the efforts of the WHL Group to fully and properly to investigate any allegations of Improper Conduct and ultimately prevent the WHL Group from taking appropriate action.

8. INVESTIGATION OF DISCLOSURE

While the circumstances relevant to each disclosure, and the investigative action required, will vary, all reviews and investigation of disclosures made by a Whistleblower under this Policy:

- will be conducted fairly and in a timely manner; and
- will be appropriately documented; and
- will keep the Whistleblower regularly updated regarding the status, expected timeframes and outcome of the review or investigation (if the Whistleblower can be contacted).

Investigations conducted by WHL or WSA will follow the procedures set out below

On receiving a disclosure from a Whistleblower, the person receiving the disclosure will initiate a preliminary enquiry/review of the disclosure and within 21 days after receipt of the disclosure must:

- (a) decide whether to:
 - (i) investigate the matter or not; or
 - (ii) refer the disclosure to another person or body (“third party”) if that disclosure could be investigated or dealt with more appropriately by the third party; provided that such referral does not identify, and is not likely to lead to the identification of the Whistleblower; and

- (b) in writing, either through the independent whistleblower facilities if the Whistleblower wishes to remain anonymous or directly to the Whistleblower if the Whistleblower has agreed to share his/her identity with the Fraud Manager or Group Company Secretary, acknowledge receipt of the disclosure and inform the Whistleblower of the decision:
 - to investigate the matter, and where possible, the time-frame within which the investigation will be completed;
 - not to investigate the matter and the reasons for such decision; or
 - to refer the disclosure to a third party for further investigation.

Where the Fraud Manager or Group Company Secretary or third party requires more than 21 days within which to decide whether or not to investigate the matter or refer it elsewhere, the Whistleblower must be informed accordingly in writing. The Whistleblower must then be kept updated regarding the status of the investigation on a regular basis of intervals of not more than two months at a time. A decision must be made and communicated to the Whistleblower within six months following the date on which the disclosure was received.

Persons conducting or third parties appointed to conduct investigations will have access to all records, data and information relevant to the investigation and employees or individuals referred to in section 5 (b) of this Policy who are requested to assist in an investigation and are able to provide relevant information are expected to co- operate.

On completion of the investigation the outcome will be shared in writing with the Whistleblower directly by the Fraud Manager or the Group Company Secretary or the third party, as appropriate.

Where the identity and contact details of the Whistleblower who reported the Improper Conduct is unknown, the Fraud Manager or Group Company Secretary or third party is not obliged to communicate the decision whether or not to investigate and/or the outcome. The Fraud Manager or Group Company Secretary or third party is still required to make the decision and where applicable, conduct the investigation and reach a conclusion.

Investigations conducted by CRG or DJs will follow the procedures set out in part F of Schedule 2

9. CONFIDENTIALITY AND PROTECTION FOR WHISTLEBLOWERS

The protection of Whistleblowers, including identity protection (keeping the identity of the Whistleblower confidential), is fundamental to achieving the objectives of this Policy. Any form of retaliation, discrimination, harassment or intimidation of a Whistleblower by others as a result of raising concerns through this Policy will not be tolerated and the relevant member of the WHL Group will take action to protect a Whistleblower who raises a concern in good faith (in South Africa) or reasonably believes (in Australia) that the information being disclosed is true.

Whistleblowers who wish to maintain anonymity should, in addition, take precautions not to compromise their anonymity by, for example, not discussing the concern disclosed with others in the WHL Group.

All concerns disclosed will be treated in confidence and every effort will be made not to reveal the identity of Whistleblowers without their permission, unless there are legal requirements to do so (for example, if a Whistleblower is required to be a witness) and their identities may need to be disclosed. However reasonable steps will be taken to protect the Whistleblowers identity in the event they are required to be a witness in matter before a court or tribunal.

The right to confidentiality may be forfeited where:

- the incident reported presents an immediate physical danger to any person;
- information supplied is malicious and the person knew it was untrue; and

A Whistleblower will not as a result of the disclosure, be subjected to:

- (a) any disciplinary action;
- (b) dismissal, suspension, demotion, harassment or intimidation;
- (c) transferred against his or her will;
- (d) arbitrary changes to terms and conditions of employment;
- (e) refused transfer or promotion;
- (f) refused a reference or provided with an adverse reference;
- (g) denied an appointment to any employment, profession or office;
- (h) any civil claim for the alleged breach of a duty of confidentiality or a confidentiality agreement arising out of the disclosure of a criminal offence or information which shows a substantial failure to comply with the law;
- (i) threatened with any of the above; or

(j) adversely affected in respect of his or her employment, including employment opportunities, work security and the retention or acquisition of contracts to perform work or render services as a result of making the disclosure,
(“Detrimental Action”)

unless the Whistleblower is responsible for, or otherwise implicated in, any unethical behaviour which has been reported by the Whistleblower.

The Group will have regard to the relevant applicable legislation of the country of operation in respect of the protection of the Whistleblower. Additional protections available to Whistleblowers disclosing a concern relating to DJ or CRG are set out in Part G of Schedule 2.

Disclosures to a legal practitioner for the purposes of obtaining legal advice or legal representation in relation to this Policy or applicable whistleblower legislation, are protected.

10. MALICIOUS WHISTLEBLOWING

A Whistleblower who intentionally discloses false information:

- knowing the information to be false or who ought reasonably to have known that the information is false; and
- with the intention to cause harm to the affected party and where the affected party has suffered harm as a result of such disclosure,

may be guilty of a criminal offence and liable on conviction to a fine or to imprisonment, in addition to which the Whistleblower may be subject to disciplinary action up to and including dismissal.

11. APPLICABLE LAWS

This Policy arises from and is aligned with the following laws relating to Whistleblowing:

South Africa

The Protected Disclosures Act No. 26 of 2000 which aims to provide procedures and protection to persons who in good faith disclose information regarding Improper Conduct by their employer or fellow employees and encourages a culture of good governance, accountability and transparency and to eradicate criminal and other wrongful conduct; and

The Companies Act which provides that the Group must establish and maintain a system to receive disclosures of the nature set out in the Companies Act, to provide protection to whistleblowers who make disclosures to the facilities referred in section 7 above, and to routinely publicise the availability of that system (which is the purpose of this Policy). As the types of disclosures that may be made under the Companies Act differ from those referred to under Improper Conduct above, a guide on disclosures under the Companies Act is included as Schedule 1 to this Policy.

Australia

The Australian *Corporations Act 2001* which provides a whistleblower protection regime for corporate and financial sector whistleblowers.

New Zealand

The New Zealand *Protected Disclosures Act 2000* sets out procedural requirements for specified whistleblowers wanting report concerns about serious wrongdoing in a workplace and provides certain protections to specified whistleblowers.

12. POLICY REVIEW

This Policy must be reviewed by the Social and Ethics Committee (“Committee”), at least every two years, or earlier if there are changes to the laws governing whistleblowers which necessitate amendment to the Policy, in which case the Policy must be updated and submitted to the Committee for consideration and recommendation to the WHL Board for approval.

SCHEDULE 1 TO WHISTLEBLOWER POLICY: DISCLOSURES UNDER THE COMPANIES ACT

The definitions in the Policy will apply for the purposes of this Schedule, unless the context indicates otherwise.

This section of the Policy deals with whistleblowing in companies registered in terms of the Companies Act.

1. Who can make the disclosure?

The following persons are entitled to make a disclosure and receive protection under the Companies Act:

- a shareholder of WSA or WHL;
- a director of WSA or WHL;
- the company secretary of WSA or WHL;
- a prescribed officer of WSA or WHL;
- employee of WSA or WHL;
- a registered trade union that represents employees of WSA or WHL or another representative of the employees of WSA or WHL;
- a supplier of goods or services to WSA or WHL or an employee of such a supplier.

2. Types of disclosures that can be made under the Companies Act and who they can be made to:

If any of the above individuals reasonably believe, at the time of the disclosure, that the information in their possession showed or tends to show that WSA or WHL, or a director or prescribed officer of WSA or WHL, had –

- (a) contravened the Companies Act, or a law mentioned in Schedule 4 to the Companies Act;
- (b) failed or was failing to comply with any statutory obligation to which the company was subject;
- (c) engaged in conduct that had endangered, or was likely to endanger, the health or safety of any individual, or had harmed or was likely to harm the environment;
- (d) unfairly discriminated, or condoned unfair discrimination, against any person, as contemplated in section 9 of the Constitution and the Promotion of Equality and Prevention of Unfair Discrimination Act, 2000 (Act No. 4 of 2000); or
- (e) contravened any other legislation in a manner that could expose WSA or WHL to an actual or contingent risk of liability, or is inherently prejudicial to the interests of WSA or WHL,

the individual concerned, is at liberty to make a disclosure in good faith, to any of the following authorities:

- the Companies and Intellectual Property Commission (CIPC),
- the Companies Tribunal,
- the Takeover Regulation Panel,
- the Johannesburg Stock Exchange,
- a legal adviser, a director, prescribed officer, company secretary, auditor, internal auditor, the Board or a Board committee of WSA or WHL.

3. Protection

A person who makes a disclosure contemplated in this section-

- (a) has qualified privilege in respect of the disclosure; and
- (b) is immune from any civil, criminal or administrative liability for that disclosure.

SCHEDULE 2 TO WHISTLEBLOWER POLICY: DISCLOSURES UNDER THE AUSTRALIAN *CORPORATIONS ACT*

The definitions in the Policy will apply for the purposes of this Schedule, unless the context indicates otherwise.

This section of the Policy deals with disclosures made by an **Eligible Whistleblower** (defined in A below) that relate to an Australian Entity or a related body corporate.

A. Who can make the disclosure?

- Any current or former person listed in section 5 of this Policy (provided they were in that role with respect to one of the Australian Entities);
- Any current or former associate of any of the Australian Entities;
- Any current or former officer (including a director or secretary) of the Australian Entities; or
- An individual who is a relative, spouse or dependant (or the dependant of the spouse) of any of the above.

Each of the above persons are an **Eligible Whistleblower** under the *Australian Corporations Act*.

B. What matters can be disclosed under the *Australian Corporations Act*?

In addition to the matters set out in section 6 of this Policy, information that the Eligible Whistleblower has *reasonable grounds to suspect* indicates that a member an Australian Entity or a related body corporate has engaged in, or is evidence of:

- misconduct (including fraud, negligence, default, breach of trust or duty); or
- an improper state of affairs or circumstances; or
- an offence against, or a contravention of the *Corporations Act*, *ASIC Act*, *Banking Act 1959*, *Financial Sector (Collection of Data) Act 2001*, *Insurance Act 1973*, *Life Insurance Act 1995*, *National Consumer Credit Protection Act 2009*; Superannuation Industry (Supervision) Act 1993, and any instrument made under these Acts; or
- conduct that constitutes an offence against any other Commonwealth law that is punishable by imprisonment for a period of 12 months or more; or
- conduct that represents a danger to the Australian public or the stability of, or confidence in, the Australian financial system.

The matters set out in this part B, are each considered Improper Conduct under this Policy.

Disclosures that are made in relation to the above matters by an Eligible Whistleblower to a person or body specified in Section 7 of this Policy or Part E of this Schedule 2 (each an **Eligible Recipient**) will qualify for protection under the *Corporations Act*. A disclosure can still qualify for these protections even if the disclosure turns out to be incorrect, provided that the Eligible Whistleblower had *reasonable grounds to suspect* that the Disclosable Matter existed at the time the disclosure was made.

C. Additional matters which can be disclosed

Information indicating that that one or both of the Australian Entities, or a related body corporate, have engaged in the following conduct may also constitute Improper Conduct under this Policy:

- theft, bribery or corruption;
- failure to comply with, or a breach of, legal or regulatory requirements; or

- contravention of the policies applicable to the Australian Entities.

Disclosures about other matters relevant to an Australian Entity may be protected under other legislation in Australia, such as the Australian *Fair Work Act 2009* (Cth).

D. What matters are excluded?

A disclosure in relation to the Australian Entities that relates solely to a **personal work-related grievance** will generally not be considered Improper Conduct under this Policy. Examples of personal-work related grievances include:

- an interpersonal conflict between the discloser and another employee;
- a decision that does not involve a breach of workplace laws;
- a decision about the engagement, transfer or promotion of the discloser;
- a decision about the terms and conditions of engagement of the discloser; or
- a decision to suspend or terminate the engagement of the discloser, or otherwise to discipline the discloser.

If, however, a personal work-related grievance has broader significant implications for the Australian Entities or the WHL Group, relates to Improper Conduct or relates to detriment or threat of detriment to the discloser for making a disclosure under this Policy, it may still be considered Improper Conduct.

Disclosures that relate solely to a personal work-related grievance will generally be dealt with under the **Grievance and Dispute Resolution Policy** of the Australian Entities.

E. Additional avenues of disclosure for concerns relating to DJ or CRG

While the WHL Group encourages an Eligible Whistleblower with a concern relating to DJ or CRG or a related entity to make their disclosure to the Australian Company Secretary at companysecretary@davidjones.com.au or via the avenues set out in section 7 of this Policy, disclosures of information relating to Improper Conduct relating to DJ or CRG or a related entity can be made to the Australian Securities and Investments Commission (**ASIC**), the Australian Prudential Regulatory Authority (**APRA**) or another Commonwealth body prescribed by regulation and such disclosure may also qualify for protection under the Australian *Corporations Act*.

The ASIC and APRA websites provide detail on how and when a Whistleblower may make a disclosure.

In certain specific “public interest” or “emergency” situations, disclosures relating to DJ or CRG may be made to members of the Commonwealth, Australian state or territory parliaments or to a journalist where the Whistleblower has previously made the disclosure to ASIC or APRA and the timeframes and requirements set out in the *Corporations Act* are met.

F. Investigation of a disclosure by DJ or CRG

All disclosures made by an Eligible Whistleblower to an Eligible Recipient will be referred to the Australian Company Secretary (subject to the confidentiality protections set out in Section 9 of this Policy).

The Australian Company Secretary will analyse the information received from the Eligible Whistleblower and will:

- decide whether the disclosure and information disclosed falls within the scope of this Policy; and
- decide whether to conduct a formal and in-depth investigation of the disclosed matter or not; or
- refer the disclosure to another person or body if that disclosure could be investigated or dealt with more appropriately by that other person or body provided.

The principles set out in Section 8 of this Policy will be applied in the conduct of an investigation by the Australian Entities

Appropriate persons appointed to conduct investigations will have access to all records, data and information relevant to the investigation, subject to the confidentiality protections set out in Section 9 of this Policy.

Employees of the WHL Group about whom disclosures are made will generally be given the opportunity to respond to the relevant allegations made in the disclosure in question.

G. Additional protections for Whistleblowers in Australia

Reasonable steps will be taken to protect the confidentiality of the identity of a Whistleblower which may include:

- securely storing all paper and electronic documents relating to a disclosure;
- training and emphasising to each person who is involved in handling and investigating a disclosure the importance of maintaining confidentiality; and
- ensuring that “secure printing” is used for the printing of any documents or communications from a Whistleblower, or in relation to the investigations of a disclosure, to ensure that such material cannot be accessed by those not directly involved in such investigations.
- ensuring that communications and documents relating to the investigation of a disclosure will not be sent to an email address that can be accessed by those not directly involved in the handling and investigations of a disclosure.

If any person becomes aware of Detrimental Action against a Whistleblower they should report such action using the reporting options set out in Section 7 of this Policy. Under the Australian *Corporations Act*, courts may make orders to remedy Detrimental Action, including orders for compensation, against individual employees and their employer.

Managing the unsatisfactory work performance of an Eligible Whistleblower will not be considered Detrimental Action, retaliation, harassment, victimisation or intimidation.

H. Available support for Whistleblowers

Current employees of the Australian Entities and their immediate families can access the independent, confidential and professional Employee Assistance Program (EAP) free of charge. The EAP is available 24 hours, 7 days a week.

I. Where is this Policy accessible?

This Whistleblower Policy will be made available to the officers and employees of the Australian Entities on relevant intranet sites, online bulletin boards or will be circulated by email.

SCHEDULE 3 TO WHISTLEBLOWER POLICY: FREQUENTLY ASKED QUESTIONS

What is whistleblowing?

Whistleblowing is the confidential reporting of Improper Conduct within an organisation.

Who do I contact if I want to report a matter?

- (a) the independent whistleblower facilities, details of which are provided in the box insert below; or
- (b) if the concern relates to an Australian Entity, the Australian Company Secretary at companysecretary@davidjones.com.au; or
- (c) Group Fraud Manager at Tip-Offs@woolworths.co.za or
- (d) if the concern relates to Improper Conduct that pertains to the Fraud Manager then the Whistleblower may make the disclosure to the Group Company Secretary at governance@woolworths.co.za.

AUSTRALASIA HOTLINE (available 24 hours, 7 days a week)	
Australian Hotline:	1800 504 994
New Zealand Hotline	0800 005 156
E-mail:	countryroad@tip-offs.com and davidjones@tip-offs.com
SOUTH AFRICA HOTLINE (available 24 hours, 7 days a week)	
Fraud Hotline:	0800 20 25 92
Free Fax:	0800 00 77 88
E-mail:	e-mail@tip-offs.com
Postal address:	Deloitte Tip-Offs Anonymous, P O Box 774, Umhlanga Rocks, South Africa, 4320
SMS Line:	SMS "Tip-Offs" to 32480 for a call back

What constitutes unfair discrimination?

Unfair discrimination is the practice of showing prejudice or bias against employees on the basis of race, gender, sex, pregnancy, marital status, family responsibility, ethnic or social origin, colour, sexual orientation, age disability, religion, HIV status, conscience, belief, political opinion, culture, language and birth by an employer.

What is meant by “conflict of interest”?

Conflict of interest is when an employee is involved in businesses or interests linked or likely to compete with the Group and the employee fails to report those interests. Please see the Group Conflicts of Interest Policy for further information.

If I choose to remain anonymous, will I be protected?

Yes, if you raise a concern in good faith (in South Africa) or reasonably believes (in Australia) that the information being disclosed is true, you will receive protection, including identity protection (keeping the identity of the Whistleblower confidential) unless there are legal reasons for disclosing your identity (for example, you are required to appear as a witness).

Who is the Fraud Manager?

Mr Massimo Muratori

Who is the Group Company Secretary?

Ms Chantel Reddiar

Who is the Australian Company Secretary?

Mr Matthew FitzGerald

Who are the current external independent providers?

Deloitte

What does good faith mean?

Good faith means doing things with integrity and honesty and without malice. These form part of the Group's core values.

Who is in charge of the hotline?

Deloitte.

Do I need to provide proof when reporting a matter?

If possible, when making disclosures, evidence should be provided. However, you will not be required to prove the truth of the information disclosed.

Do I need to advise my supervisor before reporting a matter?

No.

How can I access the Whistleblower Policy?

This Policy is available for viewing on Intranet Sites, online bulletin boards or will be circulated by email