

PROCEDURE

1. You should raise your concerns with your Manager in the first instance.
2. If however the malpractice that you wish to report concerns your Manager, or you think that it is inappropriate to disclose your information directly to your Manager for any reason, you should raise your concerns with the Compliance Manager or alternatively by calling our independent service provider (the “**Service Provider**”) on the following Whistleblowing Hotlines on +27 12 809 7004 or +27 12 809 7007 or alternatively via e-mail: lonrho@tagafrica.com.
3. Any disclosure under this procedure will be treated as completely confidential and will not result in any report to anyone within our organisation unless you agree to the contrary.
4. You may, if you wish, raise any concerns under the procedure anonymously, in writing, to the appropriate person outlined above. However, when the source of the information chooses to remain anonymous this may hamper our ability to investigate the concerns raised.
5. The Service Provider and/or the relevant whistleblowing officer will investigate the matter that you have raised as soon as is reasonably practicable. You will normally be contacted to confirm that this investigation is being undertaken. You may be requested to put your concerns in writing or to attend as a witness during any stage of the investigation. If you are requested to attend, you will normally be permitted to be accompanied by an appropriate colleague, or Trade Union Representative if you wish.
6. Where possible, you will be informed of the outcome of the investigation and any action that is proposed to rectify any established malpractice.
7. If you are unhappy about the speed or conduct of the investigation or the way in which the matter has been resolved, you should confirm your concerns in writing under our Grievance Procedure.
8. If you believe you are being subjected to a detriment by any person within our organisation as a result of you raising concerns under this procedure, you must inform the Peter Lombard of TAG Incorporated on +27 12 8097004 or by email lonrho@tagafrica.com, and appropriate action will be taken.
9. There may be matters that cannot be dealt with internally, in which case external authorities will need to become involved. Where this is necessary, we reserve the right to make such a referral without your consent (but without disclosing you as the source of the information, unless you agree otherwise).
10. If we have good reason to believe that you have not invoked this procedure in good faith, for example, for malicious reasons or to pursue a personal grudge against another employee, this will constitute misconduct and will be dealt with under our Misconduct Procedure.

The Whistleblowing Policy is required to be read in conjunction with Lonrho Limited Anti-corruption and Bribery Policy (the “**Bribery Policy**”).

INTRODUCTION

We conduct our business with the highest standards of integrity and honesty, and expect all employees to maintain the same standards. We therefore encourage an open culture in our dealings between our managers, employees and all people with whom we engage in the course of our business.

You are therefore encouraged to report any wrongdoing by us or our employees or partners that falls short of these business principles.

We recognise that employees may not always feel comfortable about discussing their concerns internally, especially if they believe that we are responsible for the wrongdoing. The aim of this Policy is to ensure that employees are confident that they can raise any matter that concerns them in the knowledge that it will be taken seriously, treated as confidential and that no action will be taken against them as a result.

You are encouraged to use the procedure set out below if you have any concerns at all about wrongdoing at work, including any criminal offence, a failure to comply with legal obligations, a miscarriage of justice, a health and safety danger, an environmental risk, a breach or potential breach of the Bribery Policy or a concealment of any of these.

WHO SHOULD USE THIS PROCEDURE?

Any person who works with or for us should use this Procedure. This includes those employed directly by us, as well as staff supplied by an employment agency. Individuals who work for us in the capacity of independent contractors are also encouraged to report any malpractice through this procedure.

SUBJECT MATTER OF DISCLOSURES

You are encouraged to disclose any matter concerning the conduct of our business which leads you to believe that malpractice is occurring, may occur or has occurred. In particular, you should disclose the occurrence or likely occurrence of any of the following:

The commission of a criminal offence;

- (a) Any failure to comply with a legal obligation or regulatory requirement applicable to our business;
- (b) Any risk to health and safety;
- (c) Any damage to the environment;
- (d) Any contravention or potential contravention of the Bribery Policy; or
- (e) The concealment of information that reveals any of the above matters.

Approved by the Board 27 March 2014

Updated sections approved 23rd September, 2016

