The Land and Agricultural Development Bank of South Africa
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CENTURION

LAND BANK
INSURANCE (SOC) LIMITED

LBI WHISTLE-BLOWING POLICY

Level 2 Policy Number
P08.12

Effective Date

This Policy will be approved by the LBI Board. It is effective from the date of approval.

Corporate Governance Requirements

This Policy must be read in conjunction with the requirements of the LBI Corporate Governance Framework (CGF).

Division	Land Bank Life Insurance Company SOC Ltd (LBLIC) Land Bank Insurance Company SOC Ltd (LBIC)
Policy Reference	P08.12
Version	Version 8
Category	Category 1-Board

Effective Date	December 2025
Next Review Date	September 2027

Policy Owner (Head of Risk)	T Tisane	Signature	
Policy Owner (CAE)	Y Haffejee		
Approver (Chairperson : Board of Directors)	Ms K Rantao	Signature	

Does the policy require recurring communication?

Yes	X	**Frequency:**	**Annually**	
			Biennial	X
No				

1. INTRODUCTION

The South Africa Protected Disclosures Act, Act 26 of 2000 (PDA), as amended, aims to promote greater openness and transparency in the workplace and acknowledges the need to offer legal protection to whistle-blowers. The Act in effect is commonly known as the Whistleblowing Act. The South African Constitution and the Labour Relations Act support the content of this Act.

The PDA protects employees against retribution such as dismissal or any prejudicial conduct if they disclose information to certain persons concerning, among other things, the commission of criminal offences, miscarriages of justice, unfair discrimination and conduct detrimental to health and safety or the environment.

2. WHY A LBI FRAUD AND ETHICS REPORTING FACILITY?

With the new emphasis on corporate ethics in the aftermath of numerous high-profile corporate financial scandals, formal whistle-blower facilities represent an increasingly important communication tool for employees to report violations of the company's ethical standards and the law, without fear of retribution.

Employees are often in a good position to identify concerns regarding misconduct within and against LBI, however, they may not want to express their concerns because they are fearful of repercussions and that speaking up would be disloyal to their colleagues or LBI. In these circumstances, it may be easier to ignore the concern rather than report what may just be an act of misconduct or malpractice.

This policy is intended to encourage and enable employees to raise serious concerns within LBI rather than overlooking the problem or "blowing the whistle" outside the company.

3. DEFINITION

List and describe all the words, and acronyms that are used throughout the document.

Employees	Any person, including fixed-term contractors, who works for Land Bank Insurance and who receives or is entitled to receive any remuneration.
Corruption	The general offence of corruption as defined in the Prevention and Combating of Corrupt Act is directly or indirectly accepting or agreeing or offering to accept any gratification from another person; giving or agreeing or offering to give any other person any gratification in order to influence that person directly or indirectly to exercise his powers, duties or legal obligations in a manner which is/amounts to: • Illegal, dishonest, unauthorised, incomplete, or biased; • Misuse or selling of information or material acquired; • Abuse of positions of authority; • Breach of trust; • Violation of a legal duty or set of rules; • Designed to achieve an unjustified result; and • Any other unauthorised or improper inducement to do or not to do anything;
Employer	"Employer means Land Bank Insurance also hereinafter referred to as LBI"
Fraud	The unlawful and intentional making of a misrepresentation that causes actual or potential prejudice to another.

Theft	The unlawful and intentional misappropriation of another's property or property, which is in his/her lawful possession, with the intention to deprive the owner of its rights permanently.
Land Bank Act	Land and Agricultural Development Bank Act (Act 15 of 2002).
Land Bank Insurance	"LBI means Land Bank Insurance SOC Ltd and Land Bank Life Insurance Company SOC Ltd"
Protected Disclosure to Employer	*"Protected Disclosure to Employer means* *(1) Any disclosure made in good faith by an Employee to the Employer-* *And substantially in accordance with any procedure authorised by the Employer for reporting or otherwise remedying the impropriety concerned, that the Employee has been made aware in terms of this Policy".*
Unethical behaviour	Means behaviour or business practices that are not in line with the Land Bank Insurance values and underlying principles of good governance.
Whistleblowing	The term "whistleblowing" in this policy refers to the disclosure by employees or contract workers, both former and current of suspected or real malpractice as well as suspected or real illegal acts and omissions at work.

4. LEGAL BACKGROUND

The PDA introduced protection against dismissal and other occupational detriments for those employees or workers who disclose information in the public interest, in prescribed circumstances, to prescribed persons.

The only provision is that the disclosure should be made in good faith.

The Act does not introduce a general right for "whistle-blowers" to receive special protection, for example, indemnity from criminal prosecution, should it be found that the "whistle-blower" had been actively involved in a criminal activity, etc.

5. Duty to Report Corrupt Transactions

Any person within LBI who is a position of authority who knows or ought reasonably to have known or suspected that any person within LBI has committed any act of Corruption or Fraud involving an amount of R100 000.00 or more, must report such knowledge or suspicion to a police official within the Directorate for Priority Crime Investigation of the South African Police Service as required in terms of the Prevention and Combatting of Corrupt Activities Act 12 of 2004 (PRECCA). Any person who fails to report as specified in this paragraph shall be guilty of an offence in terms of PRECCA.

6. STATEMENT

LBI takes misconduct or malpractice very seriously. LBI has a "Zero Tolerance Policy" concerning all crimes and violations of the company's ethical standards as contained in the LBI Code of Ethics and Standards of Conduct.

LBI is also committed to display the highest possible standards of openness, honesty and accountability.

In line with this commitment, employees who have serious concerns on any aspect of LBI's business are encouraged and expected to come forward and voice those concerns and are advised that they may do so without fear of victimisation, subsequent discrimination or disadvantage.

7. POLICY OBJECTIVES

This policy aims to

- Encourage individuals to feel confident in raising serious concerns and to question and act upon concerns about work practice;

- Ensure that individuals understand their responsibility for reporting misconduct or malpractice;
- Provide avenues for individuals to raise concerns and receive a response on any action taken;
- Allow individuals to take matters further if they are dissatisfied with management's response;
- Reassure individuals that they will be protected from reprisals or victimisation, if they have reasonable belief that they have made any disclosure in good faith.

8. GOVERNANCE OVERSIGHT

The LBI Board has tasked the Audit and Risk Committee with overseeing matters related to fraud risk, while the Social and Ethics Committee is responsible for overseeing issues related to ethics.

9. SCOPE

This policy applies to all employees of LBI including contract workers, temporary employees or persons considered to have the rights and privileges of employees or workers.

IMPORTANT NOTE: The whistleblowing policy is intended to cover concerns that fall outside the scope of other procedures and therefore does not replace a procedure that enables employees to lodge a grievance relating to their own employment.

Any serious concerns on or about any aspect of LBI business or conduct of employees can thus be reported under this policy.

This may be about something that:

- Is unlawful, fraudulent, corrupt; or
- Is against, or fails to comply with LBI's guidelines, procedures, values, policies, codes of conduct, legal obligations; or
- Falls below established standards of practice; or
- Amounts to improper or unethical conduct; or
- Constitutes sexual, physical or emotional abuse of clients/employees; or
- Endangers the health and safety of any individual; or
- Is a miscarriage of justice; or
- Procurement irregularities
- Is unfair discrimination as defined in the Employment Equity Act and Promotion of Equality and Prevention of Unfair Discrimination Act; or
- Is an attempt to cover up any of the above
- Financial Statement Fraud

10. OTHER RELEVANT POLICIES AND PROCEDURES

This policy should be read in conjunction with relevant risk policies and the LBI's Code of Ethics and Standards for Conduct and with future guidelines and procedures that may be developed from time to time and which will be brought to the notice of employees and others to whom this policy applies.

11. SAFEGUARDS

LBI's management recognises that the decision to report a concern can be a difficult one to make. If an employee raises an allegation in good faith or provide information based on reasonable suspicion the employee should have nothing to fear, as the employee will be doing his or her duty to the employer.

LBI will not tolerate harassment or victimisation of individuals, who have raised concerns, including informal pressures and such actions, will be treated as a serious disciplinable offence, which will be dealt with under the LBI disciplinary code and procedures.

The PDA protects the whistle-blower from the following occupational detriment due to the disclosure:

- Being subjected to any disciplinary action;
- Being dismissed, suspended, demoted, harassed or intimidated;
- Being transferred against his or her will;
- Being refused transfer or promotion;
- Being subjected to a term or condition of employment or retirement which is altered, or kept altered, to his or her disadvantage;
- Being refused a reference, or being provided with an adverse reference, from his or her employer;
- Being denied appointment to any employment, profession or office;
- Being subjected to a civil claim arising from their breach of any confidentiality requirement through the disclosure of a criminal act or of a planned or current failure to comply with a law;
- Being threatened with any of the actions mentioned above; or
- Being otherwise adversely affected in respect of his or her employment, profession or office, including employment opportunities and work security

Any investigation into allegations of malpractice will not influence or be influenced by any disciplinary or redundancy procedures that may already affect an employee but neither does it mean that any disciplinary action or redundancy procedures to which an employee is already a subject of be halted as a result or raising concerns.

Should an employee believe that he or she has been subjected to detriment or victimisation because of a disclosure such an employee can follow the internal grievance policy or refer the matter to the ComSec.

12. HOW TO RAISE A CONCERN

11.1 In person reporting

If an employee has a concern, he or she should not approach or accuse individuals directly or attempt to investigate the matter.

This policy encourages whistle-blowers to submit allegations in writing and to identify them directly to one of the officers listed below.

All direct disclosures will be treated in confidence and every effort will be made not to reveal your identity if you so wish. It must be appreciated that the investigation process may reveal the source of the information and a statement by an employee may be required as part of the process of gathering evidence.

It is recommended that employees should raise concerns with their immediate management or;

- Chief Audit Executive (CAE) – Yaasir Haffejee YHaffejee@landbank.co.za
- Head of Risk: Tammy Tisane ttisane@landbank.co.za

11.2 Anonymous reporting through the LBI reporting lines

LBI had to consider the decision of "whistle-blowers" that may wish to stay anonymous and have therefore established toll free LBI ethics and fraud hotlines.

Why should employee blow the whistle?

- Promote Ethical Standards: Whistleblowing helps maintain high ethical standards and ensures that everyone in the business is held accountable for their actions.
- Enhance Workplace Safety: Reporting misconduct can protect employees from unsafe practices, creating a safer work environment for all.
- Encourage Accountability: Whistle-blowers contribute to a culture of accountability, ensuring that the business addresses wrongdoing effectively.
- Support Transparency: By voicing concerns, employees help foster a transparent culture where issues can be identified and resolved openly.
- Protect the Organization: Reporting unethical behaviour can prevent potential financial losses and reputational damage to the organisation.
- Empower Change: Whistleblowing can lead to important changes in policies and procedures, improving the overall functioning of the organisation.
- Advocate for Colleagues: Speaking up on behalf of others helps protect fellow employees and establishes a supportive work environment.
- Uphold Personal Integrity: By blowing the whistle, employees can act in alignment with their personal values and principles, promoting a sense of pride and responsibility.
- Foster Trust and Respect: Encouraging whistleblowing nurtures a culture of trust and respect, where employees feel valued and committed to the organization's mission.

11.3 Escalation protocol: Whistleblowing

As a point of departure, LBI affirms that it will always take all reasonable steps to ensure that whistleblowing takes place in a non-discriminatory and confidential manner. In this regard, LBI has introduced a formal guidance process flow on the escalation of whistleblowing incidents.

The Ethics and Fraud escalation process flow was documented to provide guidance to all LBI employees and managers on the process and escalation protocol when dealing with complaints or when an employee blows the whistle, whether directly or anonymously. The guidance note also advises on the existence of and usage of whistleblowing facilities available to employees and other stakeholders.

The **LBI Ethics and Fraud Escalation Process Flow (Annexure A)** can be found in the Ethics category under Policies and Procedures.

11.4 WHAT IS LBI'S ETHICS AND FRAUD REPORTING LINES?

As stated, LBI has a "Zero Tolerance Policy" concerning all crimes and violations of the LBI's ethical standards as contained in the LBI Code of Ethics and Standards of Conduct.

LBI has created several reporting facilities to enable the reporting (anonymously or otherwise) of any such transgressions. Currently Advancecall Hotline independently administers the LBI ethics and fraud lines as to ensure anonymity.

The facility is a 24-hour, seven-days-a-week, 365-days–a-year toll free phone line, online and e-mail that professional operators employed by Advancecall Ethics & Fraud Hotline administer.

11.5 WHAT DOES THE ADVANCECALL ETHICS & FRAUD HOTLINE DO ON BEHALF OF LBI?

LBI has signed an agreement with Advancecall Ethics & Fraud Hotline. Advancecall Ethics & Fraud Hotline as a professional independent operator effectively creates a barrier between the caller/information supplier and LBI, thereby ensuring the anonymity of the caller. Advancecall Ethics & Fraud Hotline guarantees all callers anonymity, in that no caller identification exists, although calls are recorded and stored for quality purposes.

Advancecall Ethics & Fraud Hotline has bound LBI contractually that no release of caller identification, including voice recordings, will be provided to LBI. Advancecall Ethics & Fraud Hotline will receive calls and correspondence on an anonymous basis, or where the caller/information supplier wants to be identified on that basis, with specific reference to obtain information relevant to reporting fraudulent and unethical behaviour of LBI employees, LBI management, service providers to LBI and intermediaries contracted to LBI.

Fraud and Ethics Hotline Contact Details

- **Toll-free contract number** :0800 004 003
- **Email Address** : landbank@behonest.co.za
- **Online: Reporting platform:** https://behonest.co.za/Account/Login?ReturnUrl=%2F#/submission?context=ee3eedfa-101b-4046-9e09-380854 1a1f54

11.6 WHEN TO USE THE LBI ETHICS REPORT LINE AND WHAT WILL ADVANCECALL ETHICS & FRAUD HOTLINE DO?

If you have a valid and reasonable, concern and you feel that you do not want to report your concern to a representative of LBI directly, employees are encouraged to make use of the reporting facility.

- Advancecall Ethics & Fraud Hotline can field calls/information supplied in nine major official Southern African languages.
- The operators at Advancecall Ethics & Fraud Hotline will use a client-specific format that would address the needs of LBI.
- Advancecall Ethics & Fraud Hotline telephone line operators will ask specific questions related to the complaint or information provided.
- Advancecall Ethics & Fraud Hotline line operators will prepare a Hotline Disclosure Report detailing the information and provide it securely to LBI Ethics or Forensic Function.

11.7 WHO WILL DEAL WITH YOUR INFORMATION AT LBI

Under most circumstances the recipients of whistleblowing reports at LBI will be:

- The Chief Audit Executive – Yaasir Haffejee.
- Alternatively, the responsible LBI Head of Risk, Tammy Tisane

There is, however, a formal **LBI Escalation Process Flow (Annexure A)** that advises Advancecall Ethics & Fraud Hotline and employees on how information will be escalated based on specific circumstances. In this regard, employees are referred to the LBI Ethics and Fraud Escalation Process Flow note.

13. ALLEGATIONS

Employees are advised to set out the background and history of the concern, giving names, dates, and places where possible and the reason why you are particularly concerned about the situation. Include any proof that you may have to support the allegation (invoices, bank statements, purchase orders). If you are in possession or aware of any other evidence and where it can be found, please provide the detail to assist with the investigation. The earlier concerns are expressed, the easier it is to act.

Although employees are not expected to prove the truth of an allegation, employees will need to demonstrate that there are reasonable and sufficient grounds for the concern raised.
The Ethics and Forensic Function or the Ethics Report Line Consultant will also assist whistle-blowers in this regard.

14. False Allegation

If an allegation is made in good faith, but not confirmed by the investigation the reporting facility has worked. However, an allegation made in a frivolous or malicious manner or for personal gain will undermine the existence of reporting facilities and will discourage employees to make use of such facilities. Such allegations will also tie up resources and influence giving attention to real issues.

If a person is therefore identified at any stage after making such frivolous, malicious or for-personal-gain allegations, LBI will take strong action against such a person. The PDA also makes it an offence to provide false information intentionally and where this results in harm, a conviction may result in a fine, imprisonment or both.

15. HOW LBI MANAGEMENT WILL RESPOND

Action taken by LB Forensic Function or Ethics Office or People and Culture (P&C) will depend on the nature of the concern that is raised and taking in account the LBI escalation protocol.

Any matter raised may be:

- Investigated internally by the Ethics Function or Forensic Function or P&C,
- Referred to the South African Police Services or
- Form the subject of an independent inquiry

In order to protect individuals and LBI, initial enquiries will be made to determine whether an investigation is appropriate and if so, what form the investigation should take. Some concerns may be resolved by agreed actions without the need for an investigation.

LBI management will respond to whistleblowing reports in accordance with the escalation protocol and the timelines set out below. This structured process ensures transparency, accountability, and confidentiality, with all communication channelled through the Ethics Report Line Service Provider (Advancecall Hotline).

- Within **ten (10) working days** of a concern being received, the relevant ethics or forensic officer will write to the Ethics Report Line Service Provider for onward transmission, to acknowledge that the concern has been received

Ongoing Updates

- The whistle-blower will receive regular updates through the Service Provider at intervals not exceeding two months.

- Updates will include progress of the investigation, interim actions taken, and expected timelines for finalisation.

Final Outcome

- The whistle-blower will be advised, via the Service Provider, of the final decision to investigate or not, and of the outcome where appropriate.
- Where confidentiality or legal obligations limit disclosure, the whistle-blower will be informed of this constraint.
- LBI may, where appropriate, arrange for an independent body e.g. Internal Auditors to investigate the matter to ensure impartiality.
- Any failure to protect whistle-blowers or to follow proper governance processes will be escalated by ComSec to the appropriate oversight committee.

Whistle-blowers will be given as much feedback as possible, but sometimes-precise action will not be set out especially where this would infringe on a duty of confidence that LBI owes to someone else or if it is necessary to avoid prejudice to the prevention, detection or investigation of a criminal offence.

LBI may on occasion and after informing the whistle-blower change the time limits referred to in this policy

The amount of contact between the whistle-blower and the representative of LBI who is considering the issues will depend upon the nature of the matters raised, the potential difficulties involved and the clarity of the information that was provided. If necessary, further information will be sought from the whistle-blower through the Ethics and Fraud Hotline Service Provider.

When any meeting is arranged, the whistle-blower has the right, if so wished to be accompanied by a colleague or other representative who is not involved in the area of work to which the concern relates.

LBI will also take steps to minimise any difficulties that a whistle-blower may or could experience as a result of raising a concern, for instance, if the person is required to give evidence in criminal or disciplinary proceedings, management will arrange for the whistle-blower to receive advice on the process, etc.

LBI acknowledges the importance of assuring whistle-blowers that their concerns are handled appropriately. If a whistle-blower is dissatisfied with management's response and has reasonable grounds for their dissatisfaction, LBI may arrange for an independent body, such as internal auditors to investigate the issue.

While management cannot guarantee that it will respond to all matters in the way that a whistle-blower may wish for, LBI will endeavour to handle all matters fairly and properly. By abiding to this policy, employees will assist management to achieve the objective of this policy.