

PROTECTED DISCLOSURES ("WHISTLE BLOWING") POLICY

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Western RSA Board	27 June 2025	Recommendation by Internal Audit that policy be board approved
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PROTECTED DISCLOSURES (“WHISTLE BLOWING”) POLICY

Scope

1. This Whistle blowing policy will apply to any Person who wish to report any incident and/or tip-off that in their opinion may relate to any dishonest or fraudulent action/inaction by any person through their relationship with Western.

Definitions

1. ‘Person/s’ refer to any individual associated or employed by Western itself and/or any of its intermediary partners, service providers or policyholders or ex-employees of these mentioned groups.
2. Whistle blowing inside the scope of this policy is the reporting by a Person of any wrongdoing such as fraud, mismanagement, breach of laws or any other illegal or unethical act throughout any business, partnership and/or contractor used by Western.

Purpose

1. This policy provides procedures and guidelines to Persons to report practices that are in conflict with Western’s business principles, unlawful conduct, financial malpractice or dangers to the public or the environment.
2. This Policy intends to address organisational accountability, transparency and individual responsibility by encouraging Persons to report crime and irregularities in a responsible and ethical manner.
3. Persons who report matters in good faith are protected. Protection from any occupational detriment does not extend to immunity for any complicity of the disclosure.

Personal Grievances

This policy does not apply to the lodging of personal grievances.

A disclosure made internally is a protected disclosure

Any disclosure made by any Person (the “whistle-blower”) shall, in terms of this policy, constitute a protected disclosure if

- the whistle-blower acts in good faith, and
- he/ she follows the process set out in paragraph 7 below for making the disclosure.

How to raise a concern/make a disclosure internally

1. Any Person who has a concern or who has information, which he or she reasonably believes to be true, about unlawful or irregular conduct in any part of the business, is in terms of this policy encouraged to first raise his or her concern with, or to first disclose the said information to the Western Legal and Compliance Manager
2. This may be done in writing to:

Post Legal and Compliance Manager
 5th Floor,
 The Edge,
 3 Howick Place
 Tyger Waterfront

E-mail fraud@westnat.com; or

Telephone 021 914 0290 (Ask for Legal and Compliance Manager).

3. Disclosures of suspected improper activities are encouraged to be made in writing or e-mail. Such reports should be factual rather than speculative and contain as much specific information as possible to allow for a proper investigation.

Investigating the Disclosure

1. The Legal and Compliance Manager must conduct a proper investigation into the allegation.
2. The Legal and Compliance Manager shall, if so requested by the individual, keep his/ her details confidential.
3. The Legal and Compliance Manager may question the Person who made the disclosure and the Person shall have an opportunity for input during the investigation.
4. No allegation of wrongdoing shall be sustained unless the evidence supports the allegation on a balance of probabilities.
5. The Person who gave to disclosure have a right to be informed of the outcome of the investigation.
6. The outcome of the investigation may or may not support a conclusion that an improper act was committed, and if so, by whom.
7. If the investigation leads the Legal and Compliance Manager to conclude that a crime has probably been committed, the results of the investigation must be reported to the South African Police Services. If there is no merit in the allegation and/ or no action is warranted, the Legal and Compliance Manager must explain why he/she has chosen not to act.
8. Any disclosure made maliciously or in bad faith and without reasonable grounds for believing that the allegations are true, is a disciplinary offence.