

Type:	Policy
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## Policy statement

Stanbic IBTC Pension Managers Limited (the Company) encourages its employees to embrace its values, especially the upholding of the highest levels of integrity. This applies also when observing unlawful or irregular conduct. Inherent in these values, is the need to enable employees to report such conduct in a timeous and responsible manner, without fear of reprisal. The company, in response to the PenCom's Guideline on Whistle Blowing, will apply the highest standards of accountability and corporate governance.

The Company's Whistle-blowing Policy provides for the following:

- The obligation of employees to comply with the terms and conditions of their contracts of employment, including the requirement of the non-disclosure of confidential information.
- Where an employee discovers information, which they honestly believe shows wrongdoing within the company, it should be disclosed without fear of reprisal.
- No employee shall feel at a disadvantage when reporting legitimate concerns.
- The company undertakes to protect employees who make a report by taking appropriate measures against possible occupational detriment.
- The company will not protect employees who maliciously report concerns and appropriate disciplinary action will be taken, in such cases.
- The policy must, where necessary, give effect to applicable legislation regarding protected disclosures or whistle-blowing, which is in force in each area in which the company operates and conducts business.

## Roles and responsibilities

### Board Audit Committee

- Support implementation of this policy.
- Review reports on non-compliance with this policy.

### Internal Audit & Controls

- Will establish an "Office for Whistle-blowing" to handle reporting, investigations, feedback, monitoring and review in line with the approved Whistle Blowing procedure.
- Implement this policy.
- Report on non-compliance with this policy to the Board Audit Committee.
- Approve requests for exceptions to this policy.

### Executive Committee

- Will have arrangements, independent of line management, in place for confidential reporting of legitimate concerns.
- Will establish standards for reporting concerns to management and Internal Audit in a secure and timeous manner.
- Implement this policy and develop standards, where applicable, in line with this policy.
- Monitor compliance with this policy.
- Report any exceptions to Board.

**Confidential**

**Related information**

- National Pension Commission's Whistle Blowing Guideline for Pensions

**Policy administration**

**Contact person**

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**Versions of this policy**

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**Key words  
(to assist in locating this Policy  
using the search function)**

Whistle-blowing  
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Whistle-blowing Policy Standards