

AGRI FINANCE FACILITY (PTY) LTD

WHISTLEBLOWING POLICY

Version 1.0 | 1 October 2025

1. Purpose and Scope

Agri Finance Facility (Pty) Ltd (“AFF”) is committed to the highest standards of ethical conduct, integrity, transparency, and accountability in all its operations. This Whistleblowing Policy aims to provide a structured process for individuals to raise concerns about actual or suspected wrongdoing, corruption, fraud, misconduct, or unethical behaviour in or associated with AFF.

This Policy applies to:

- a. All AFF employees, including part-time, fixed-term, and temporary staff
- b. Directors and Board members
- c. Contractors, consultants, suppliers, service providers, and business partners
- d. Beneficiaries and members of the public interacting with AFF

The Policy is aligned with:

- a. **South African legislation**, including the Protected Disclosures Act (Act 26 of 2000)
- b. **International best practices** and standards required by the **Foreign, Commonwealth & Development Office (FCDO)** and other development partners.

2. Policy Statement

AFF fosters a culture where employees and stakeholders can raise concerns without fear of retaliation. Whistleblowing is seen as a positive act of accountability and transparency. AFF encourages disclosures made in good faith and undertakes to investigate all concerns thoroughly, fairly, and confidentially.

3. What Can Be Reported?

Whistleblowing applies to concerns related to wrongdoing that is in the public interest. Examples include, but are not limited to:

- a. Fraud, corruption, bribery, or theft
- b. Misuse of company assets or resources
- c. Gross misconduct, abuse of power, or harassment
- d. Conflict of interest or unethical practices
- e. Discrimination or unequal treatment
- f. Non-compliance with laws, regulations, or internal policies
- g. Financial mismanagement or reporting irregularities
- h. Endangerment of health, safety, or the environment
- i. Undermining the empowerment, transformation, and inclusion of historically disadvantaged groups

4. Whistleblowing vs Grievances

This Policy is not intended to replace other internal procedures for personal grievances or disputes. Complaints of a personal nature (e.g., interpersonal conflict, dissatisfaction with a line manager) should be addressed through AFF's **Grievance Policy**.

5. Reporting Channels

AFF provides multiple secure and confidential channels for reporting:

Internal Reporting

Whistleblowers can report concerns to:

- **Line Manager** (if appropriate)
- **The report is escalated to the Chair of the Board/Audit Committee as considered appropriate.**

Independent Reporting (External Hotline)

To ensure impartiality and protection, AFF partners with an independent whistleblowing service provider:

WhistleBlowers™ Hotline (24/7/365)

Tel: 086 000 5050 (from South Africa)

+27 31 308 0600 (international)

Email: admin@whistleblowing.co.za

Web: <https://www.whistleblowing.co.za/>

Anonymous Reporting

Whistleblowers may choose to remain anonymous. AFF will respect this choice and still seek to investigate based on available information.

6. Protection of Whistleblowers

AFF commits to protecting whistleblowers from:

- a. Retaliation, victimisation, or harassment
- b. Dismissal, demotion, or disciplinary action
- c. Any adverse treatment as a result of the disclosure

Whistleblowers will be protected under the **Protected Disclosures Act (2000)** and, where applicable, under **FCDO safeguarding principles**.

AFF will take disciplinary and legal action against anyone who victimises a whistleblower or tries to suppress a disclosure.

7. Investigation Process

Upon receipt of a disclosure:

- a. **Acknowledgment** (if possible) within 5 business days
- b. **Preliminary Assessment** to determine validity and scope
- c. **Formal Investigation** by the Internal Audit or Compliance Department or independent investigators
- d. **Outcomes & Actions** may include disciplinary action, legal proceedings, or systemic reforms

Whistleblowers will, where appropriate and safe, be informed of the outcome.

8. Confidentiality

All disclosures will be treated in the **strictest confidence**. Information will only be shared with individuals directly involved in investigating or responding to the disclosure. No identifying details will be released without the whistleblower's consent, unless legally required.

9. Malicious or False Allegations

While AFF encourages whistleblowing, false or malicious allegations made with intent to harm others or the company may lead to disciplinary action. Whistleblowers who make disclosures **in good faith**, even if not substantiated, will be protected.

10. Responsibilities

Board of Directors

- Ensure oversight and accountability
- Approve and periodically review the Policy

Management

- Promote awareness of this Policy
- Create a safe environment for disclosures

Whistleblowing Officer / Compliance Team

- Receive and assess disclosures
- Oversee investigations and recommend actions
- Maintain confidential records

All Staff & Stakeholders

- Act ethically and in accordance with this Policy
- Report suspected wrongdoing promptly

11. Training and Awareness

All AFF employees and contractors will receive:

- a. **Induction training** on this Policy
- b. **Annual refresher training**
- c. Access to resources and support for reporting

Periodic awareness campaigns will reinforce AFF's zero-tolerance approach to corruption, fraud, and abuse.

12. Monitoring and Review

This Policy will be reviewed **annually**, or sooner if required by law or organisational changes. Revisions will be approved by the Board and communicated to all stakeholders.

13. Alignment with AFF’s Mission and Sectoral Context

Given AFF’s role in transforming the South African agricultural sector, particularly in supporting historically excluded black farmers and rural communities, whistleblowing is a vital tool for ensuring:

- a. Equitable and ethical allocation of finance and support
- b. Prevention of misuse of developmental funds
- c. Reinforcement of inclusive and sustainable transformation

14. Reporting to FCDO and Other Donors

In line with FCDO and other development partner requirements, AFF shall:

- a. Promptly notify funders of any material fraud, corruption, or safeguarding breaches
- b. Cooperate fully in donor-led investigations or audits
- c. Maintain transparent records for accountability

15. Policy Ownership

This Policy is owned by the **Compliance & Risk Department** and endorsed by the **Board of Directors** of AFF.

Approved by:

Board of Directors

Agri Finance Facility (Pty) Ltd

Date of Approval: 6 October 2025

Next Review Date: September 2026