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## 1. PURPOSE OF THE POLICY


The purpose of the “WHISTLE BLOWING POLICY” is to encourage and enable all CTC staff, learners, contractors, suppliers, and visitors to disclose and report any malpractice, misconduct, or other unethical behavior which they may become aware of during the normal course of business.

## 2. SCOPE OF THE POLICY

- The policy applies to all our suppliers, contractors, employees, learners, and visitors.
- The policy will replace all previous policies, practices and correspondence relating to this specific policy.

## 3. INTRODUCTION

- CTC is committed to the standards of ethical, moral, and legal business conduct.
- Ethical business behavior is the responsibility of every person in the company and is reflected in our relationships with all our stakeholders such as our employees, customers, suppliers, partners, and shareholders.
- CTC Code of Ethics and related corporate policies are a key component of our commitment to high standards of business and personal ethics in the conduct of business.
- In line with this commitment, we expect employees and others that we deal with, who have serious concerns about any aspect of work to come forward and communicate these concerns through the appropriate channels provided by the company, without any concerns or fear of victimization.
- Wherever practical, and subject to any legal constraints, matters reported will proceed on a confidential basis.
- All CTC employees, contractors, learners, and visitors are strongly encouraged to report their concerns through the normal business channels, which can include, for example, immediate supervisors, HoD, Human Resources Representatives, CTC Board Secretary, or the Chief Executive Officer.
- The introduction of the CTC Whistle Blowing Line is a supplementary reporting mechanism through which to raise concerns if, for any reason, an employee, learner, contractor, or external stakeholder is uncomfortable with using the normal business channels or unsatisfied with the response from the normal business channels.
- The system is available for use by all CTC learners, employees, contractors, and external stakeholders.

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#### 4. COMPLIANCE WITH THE PROTECTED DISCLOSURES ACT

The Protected Disclosures Act makes provision for procedures in terms of which persons who disclose information of unlawful or corrupt conduct by their employers or fellow employees are protected from occupational detriment. This law is there to encourage honest employees to raise their concerns and report wrongdoing within the workplace without fear.

CTC subscribes to the principles and requirements of this Act and in order to reaffirm our compliance with the Act, CTC will:


- a) Ensure protection of employees who submit a disclosure in good faith and use the appropriate reporting channels provided by CTC;
- b) Strive to create a culture which will facilitate the disclosure of information by learners, employees, contractors, and visitors relating to criminal and other unethical or irregular conduct in the workplace in a responsible manner by providing clear guidelines for the disclosure of such information and protection against reprisals as a result of such disclosure;
- c) Highlight the various channels available to suppliers, employees, learners, contractors, and visitors of CTC to raise concerns and receive feedback on matters reported and any action taken by management in addressing the matters reported;
- d) Reassure employees that they will be protected from reprisals or victimization for disclosures made in good Faith.
- e) Promote zero tolerance to any criminal and other unethical or irregular conduct within CTC.

#### 5. OBJECTIVES

This Whistle Blowing Policy is intended to provide overall guidance for the reporting of concerns and to further encourage and enable staff to raise concerns within CTC rather than overlooking the problem or reporting such concerns through inappropriate channels.

There are existing procedures available for employees to lodge grievances relating to their own employment, which will not be superseded by this policy. Therefore, the mechanisms available through this policy should not be used as an avenue to report issues that have already been addressed through the grievance or complaints procedures.

This policy is intended to address concerns that, although not exhaustive, include the following:

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- Conduct which is an offence or a breach of law;
- Disclosures related to miscarriages of justice;
- Health, safety, and quality risks, including risks to the public as well as other employees;
- Damage to the environment;
- The unauthorised use of company resources;
- Possible fraud and corruption;
- Sexual or physical abuse;
- Other unethical conduct;
- Serious failure to comply with appropriate professional standards;
- Abuse of power, or use of company powers and authority for any unauthorised use or personal gain;
- Deliberate breach of CTC policies and/or procedures.


## 6. ACTING IN GOOD FAITH

Users of the CTC Whistle Blowing Line must act in good faith and must not make false accusations when reporting any concerns. Good faith is when a disclosure is made without malice or consideration of personal benefit and the complainant has a reasonable basis to believe the report to be true.

## 7. REPORTING CHANNELS

In order to remain in compliance with the Protected Disclosures Act, CTC will:

- a) Ensure protection of learners, contractors, visitors, suppliers, and employees who submit a disclosure in good faith, using the appropriate channels provided by CTC.
- b) As a first step, learners, contractors, employees should normally raise concerns with their immediate Manager or their Superior. This depends, however, on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice.
- c) If an employee, learner, contractor is for any reason uncomfortable using the normal business channels, they should then contact the CTC Whistle Blowing Line.
- d) Concerns may be raised in writing. Should you wish to make a written report, you are requested to use the following format:
  - The background and history of the concern (giving relevant dates);
  - The reason you are particularly concerned about the situation;
  - The extent to which you have personally witnessed or experienced the problem (provide documented evidence where possible). Although suppliers, visitors, employees, learners, and contractors are not expected to prove beyond reasonable doubt the truth of an allegation,

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they will need to demonstrate to the person contacted that there are reasonable grounds for their concern.

## 8. SAFEGUARDS – HARASSMENT AND VICTIMISATION

CTC is committed to good practice and high standards and wants to be supportive to employees, learners, and external parties.

- It recognises that the decision to report a concern can be a difficult one to make and is therefore committed to ensuring that an employee is protected for a disclosure made in good faith.
- Retaliation by any employee, learner, and external party, directly or indirectly, against any person who, in good faith, submits a disclosure or provides assistance to those responsible for investigating the allegations will not be tolerated.
- Remember, if you have followed the procedures, you are protected by The Protected Disclosures Act.
- No person will suffer harassment, retaliation, or adverse employment consequences as a result of the submission in good faith of their disclosure.

Any person, who retaliates against someone who has submitted a disclosure pursuant to this policy in good faith, shall be subject to disciplinary action following which the maximum sanction will be applied.

## 9. DEFINITION OF A DISCLOSURE

A disclosure is a reported concern that has been submitted by an employee, learner, contractor, or external stakeholder, acting in good faith using the CTC Whistle Blowing Line.

It does not include issues or concerns raised by employees through normal business channels in an open, non-confidential manner.


All disclosure reports will be treated in confidence.

## 10. REPORTING AND RECORDING OF DISCLOSURES

Users of the CTC Whistle Blowing Line can report their disclosures using any one of the following mediums of communications to the Secretary of CTC board:

- Use e-mail address: [emuller@ctctraining.co.za](mailto:emuller@ctctraining.co.za)
- Cell Number: 083 3002183
- Post address: Post net Suite 65 Private Bag X 7260, Witbank 1035

## 11. HOW WILL THE COMPANY RESPOND?

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- a. CTC will respond to all valid disclosures made.
- b. CTC will ensure the employee's protection if the disclosure is made in good faith.
- c. In order to protect individuals and those accused of misdeeds or possible malpractice, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take.
- d. Where an investigation is appropriate, the matters raised will either:
  - Be investigated internally by management or through the disciplinary process; or
  - Be referred to an independent outside service provider with the necessary specialist expertise and experience in dealing with the type of disclosure made. This will be reviewed on a case-by-case basis.
- e. Some concerns may be resolved by agreed action without the need for formal investigations. If urgent action is required, this will be taken before any investigations are conducted.
- f. The investigation and the duration thereof will depend on the nature of the matters raised, the difficulties involved, and the clarity of the information provided. If necessary, further information will be sought from the individual if this is possible.
- g. The investigations will be handled in a confidential manner and will not be disclosed or discussed with any persons other than those with a legitimate right to such information. Appropriate feedback will be provided upon request, by the whistle blower.

## 12. THE RESPONSIBLE OFFICER

The Chief Executive Officer has overall responsibility for the maintenance and implementation of this policy.

The CTC Board Secretary will maintain a record of concerns and the outcomes (but in a form which does not endanger confidentiality) and will report as necessary to the CTC Board.