



## WHISTLEBLOWER / TIP-OFF ANONYMOUS POLICY

### 1. Policy statement

Zimplats is committed to providing a safe and secure operating environment and promoting compliance to regulatory requirements, commitment to highest ethical conduct, integrity, transparency and accountability. Zimplats does not tolerate unethical behaviour. As a result, concerns of malpractice, fraud, corruption, sexual exploitation, abuse, bullying and harassment, among other malpractices, are taken seriously and responded to consistently and fairly in accordance with laid down investigation protocols and ensuring that externally and internally reported cases are treated with utmost confidentiality.

It is important that the people who work with Zimplats i.e. employees, contractors, suppliers and other stakeholders feel safe to report concerns of suspected malpractice or any unethical conduct without fear of discrimination, victimisation or reprisal. The purpose of this policy and procedures is to provide a safe, secure, and confidential mechanism for external and internal stakeholders to report all forms of misconduct/ unethical behavior or breaches of company procedures without fear of retaliation. Every effort will be taken to ensure accessibility and anonymity through secure external and internal channels.

### 2. Purpose of the policy

This policy aims to;

- a) Provide a mechanism through which our employees, contractors and stakeholders have a secure platform to raise concerns of malpractice occasioned by any of our employees, contractors, suppliers or business partners.
- b) Encourage our employees and the third parties to raise concerns of malpractice at the earliest opportunity
- c) Inform our employees and third parties of the avenues of raising concerns and what to expect after they raise their concerns
- d) Assure those who raise concerns of protection from possible reprisal and victimisation
- e) Provide for a culture of zero tolerance towards fraud, corruption, bribery and any malpractice
- f) Explain what qualifies as a whistle-blow / tip-off anonymous and provides guidelines on how to report a concern and the established prize framework to encourage reporting
- g) Encourage stakeholders to bring out information helpful in enforcing good corporate governance practices and Zimplats values
- h) Mitigate against any fraud, operational or regulatory risk that could lead to potential financial loss or damage to Zimplats reputation

### 3. Scope

This policy applies to:

- All employees (permanent, temporary, and contract staff)
- Suppliers, contractors, and consultants
- Community members and other stakeholders directly or indirectly affected by Zimplats activities

#### **4. What qualifies for whistle blower / tip off anonymous reporting**

Zimplats considers reportable unethical behaviour or malpractice to include, but not limited to:

- Breaches related to safety, health and environmental
- A criminal offence including fraud, theft, bribery, corruption or money laundering
- Breaches of applicable legislation or regulations
- Human rights abuses or unethical labour practices
- Conflicts of interest or abuse of authority
- Discrimination, harassment (including sexual harassment), or bullying
- Concealment or deliberate misrepresentation of information)
- Failure to comply with Zimplats policies and procedures
- Unethical behaviour in the Zimplats supply chain

#### **5. Definitions**

##### **5.1. Whistleblowing**

When an employee or associated third party such as a supplier or a stakeholder goes outside the normal management channels to report suspected wrongdoing at work i.e. speaking out in a confidential manner. This can be done via internal processes set up within our SHEQ Department (internal whistleblowing) or to an external tip-off anonymous facility (external whistleblowing). Whistleblowing is different from raising a grievance, which employees should pursue using the Grievance Policy.

##### **5.2. Whistleblower**

An individual who alerts Zimplats, via the appropriate channels, to serious malpractice or actions that endanger its employees or assets, including its reputation. The individual could be an internal party (e.g. an employee) or an external party (e.g. suppliers or the general public).

##### **5.3. Good Faith Reports**

These are reports made by someone on reasonable belief that the information they report is true, even if it later turns out to be incorrect, they are protected from any consequences. The emphasis is on honest intent.

##### **5.4. Malicious or Bad-Faith Reports**

This is where someone knowingly files a false report to harm a colleague, gain advantage, disrupt operations or settle personal scores. This is classified as abuse of the whistle-blower system.

#### **6. Reporting mechanisms**

The reporting mechanism shall be governed by the Deloitte Tip-Off Anonymous Reporting System currently managed by Axcentium, one of Zimbabwe's leading professional services firms for expert solutions in Audit and Assurance, Risk Advisory, Tax Advisory and Consulting.

With the Deloitte Tip-Off Anonymous system, the whistle-blower does not identify themselves to anyone at any stage. However, enough information must be provided to facilitate a thorough investigation on the allegations. The reporter is assigned a tag / code which is used throughout the investigation.

#### **7. Managing / investigating a tip-off anonymous report**

Zimplats commits to respond to all concerns received, thoroughly investigating them and upholding confidentiality. A designated independent employee to be appointed by management

will be appointed to investigate a tip-off matter brought to the company through any one of the channels. When reports are received from a confidential whistleblower, the designated independent employee will respond promptly to the whistleblower and where necessary seek more clarity on the concern during investigation.

It is important to protect the independence of the investigation. No employee who may potentially be implicated in the whistleblowing matter should take part in the investigation.

Details of the processes of investigating a tip-off anonymous report are found in the Tip-off Anonymous Management Procedure.

## **8. Compliance with data protection laws**

Throughout the reporting, investigation and management of a tip-off report, the security of personal data relating to the whistleblower shall be maintained in line with the Cyber Security and Data Protection Act. The Deloitte Tip-Off Anonymous system has been embedded with features to allow for the guarantee of security of personal data.

## **9. Protection of whistle-blowers**

Management prohibits any form of retaliation (harassment, dismissal, demotion, intimidation, or discrimination) against any whistle blower. Persons who wish to raise concerns are encouraged to do so without fear of reprisal, discrimination or victimisation. Zimplats will handle all reports from whistle-blowers with complete confidentiality to protect the whistleblower from any retaliation.

Any employee who believes that they have been subjected to interference, threats, reprisals, retaliation, coercion or intimidation because they have raised a concern under this reporting mechanism should inform their line manager, Human Resources or another senior employee immediately, or report the matter through the whistleblowing hotlines (whichever reporting mechanism they feel is convenient).

Victimising, discriminating or intimidating anyone who raises a concern is considered gross misconduct and will be promptly investigated and dealt with subject to the Company's disciplinary code of conduct. Breach of confidentiality will also be considered a disciplinary matter.

## **10. Rewards / awards**

To incentivise and promote the culture of reporting unethical behaviour, a reward / award system has been established. Details of the award system are in the Tip-offs anonymous procedure.

## **11. Malicious or bad faith reporting and abuse of procedure**

Whistleblower protections exist to encourage people to report genuine misconduct without fear of retaliation. But the system also must guard against abuse. Employees are therefore encouraged to make reports in good faith, having satisfied themselves, to a reasonable degree, that the matter being disclosed or reported as a concern did in fact occur and believing that the information disclosed is substantially true.

Malicious or bad faith reporting occurs when an employee lodges a false tip-off report knowing well that the matter being reported has not occurred or is materially untrue but is used to settle personal vendettas or scores. Malicious reporting does not include whistle-blower reports which are lodged or reported according to this policy in good faith, and which subsequently are not supported by evidence and become unsubstantiated or unproven.

While whistleblowers should never be punished for good faith mistakes, deliberate, malicious reports can justifiably result in discipline as per the company's disciplinary code. It is, however, crucial to ensure that a report is not labelled as malicious without evidence to prove the malice. That is why investigations should be thorough and objective, with evidence of bad faith required before a report is classified as malicious.

## **12. Training and communication**

Zimplats will communicate this policy and its implementation to the board through the Audit and Risk Committee, all its employees, contractors and all those who are covered within the scope of this policy. Communication will be done through various mechanisms including training workshops, notice boards, information pamphlets and emails.

## **13. Whistleblowing / Tip-off anonymous Hotlines**

Zimplats whistleblowing hotlines are managed by a trusted, independent, third party which guarantees confidentiality and ensures anonymity of the whistleblower. The free hotline provides an anonymous reporting channel for unethical behaviour.

To report suspected fraud, corruption, human rights abuse and misconduct, parties can phone our anonymous Whistle Blower Hotline (Tip-Offs Anonymous) Toll free numbers:

Cell phone voice numbers:

**Econet:** 0808 5500/4461

**Netone:** 0716 800 189/0716 800 190

**Telecel:** 0732 220 220/0732 330 330

### **WhatsApp:**

**Econet:** 0772 161 630

**Netone:** 0718 267 886

**Email:** reports@axcentiumethicsline.co.zw

**Free post:** The Call Centre, PO Box HG883, Highlands, Harare

These numbers are available 24 hours a day, seven days a week. All calls to this line are made to an independent third party and all information is treated as strictly confidential. The anonymity of all callers is guaranteed.

## **14. References**

This policy should be read in conjunction with the following policies and procedures to which it makes references:

- Zimplats Ethics Policy
- Zimplats Anti-Bribery and Anti-Corruption (ABAC) Policy
- Zimplats Tip-off Anonymous Management Procedure
- Deloitte Tip-Off Anonymous Reporting System
- Cyber Security and Data Protection Act

## **15. Review of policy**

This policy will be reviewed at least once every three years to ensure effectiveness, compliance with legislation, and alignment with best practices.

Alex Mhembere

**CHIEF EXECUTIVE OFFICER**