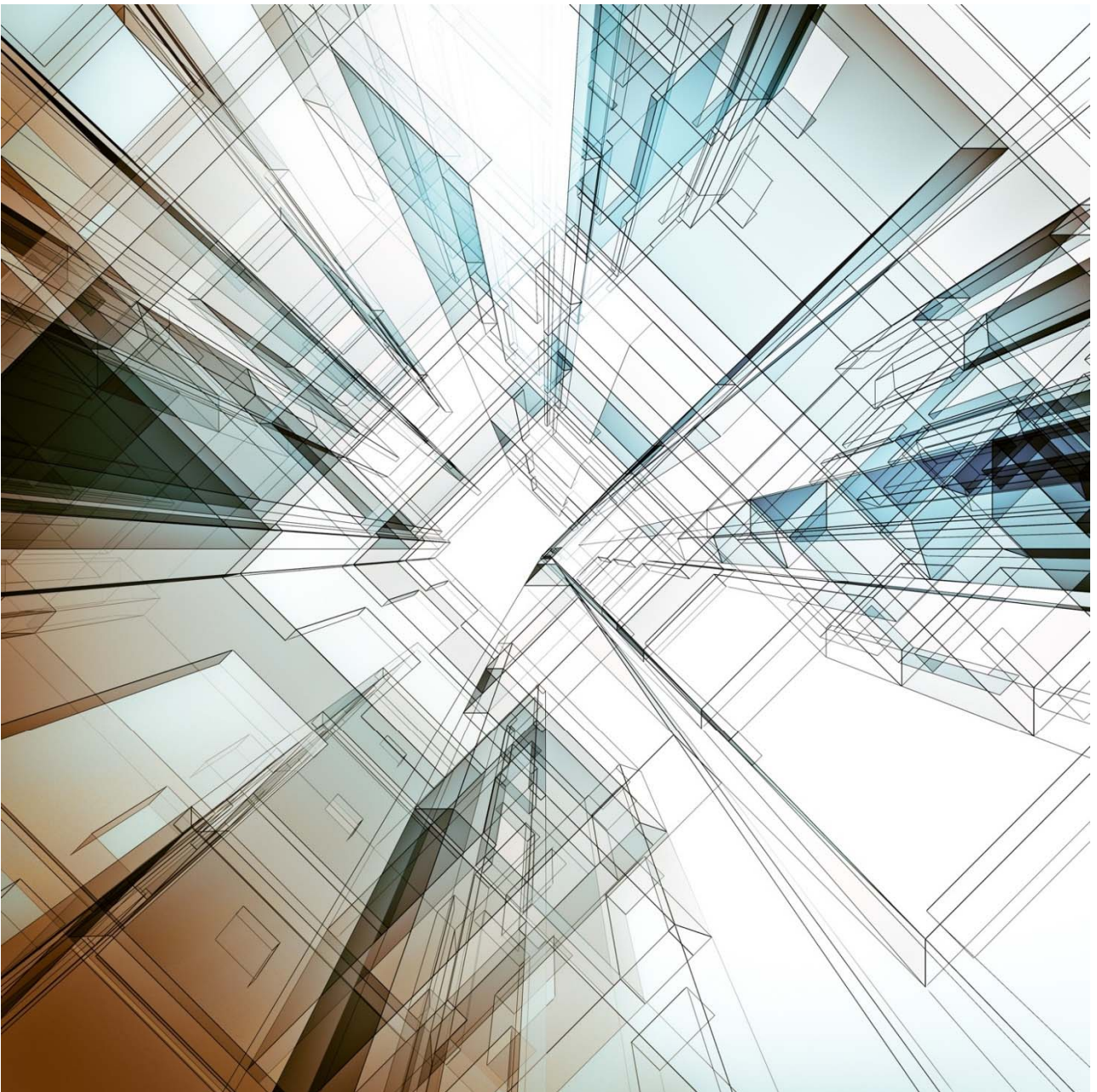


WHISTLEBLOWING POLICY

As approved by the Board on 1 September 2021



1. Introduction

Any Employee, or person falling within the Scope described in Clause 3, with reason to believe that there has been Improper Conduct within Safari, must report such a concern, regardless of whether the Improper Conduct may impact the business of Safari.

The South Africa Protected Disclosures Act, Act 26 of 2000 (PDA), also known as the Whistleblowing Act, aims to promote greater openness and transparency in the workplace and acknowledges the need to offer legal protection to whistleblowers. The PDA protects Employees against retribution such as dismissal or any prejudicial conduct if they disclose information.

2. Definitions

The following definitions apply to this policy:

"Employee" means any person employed by Safari including a person that falls within the scope of Clause 3 of this Policy.

"Improper Conduct" means any conduct that is deemed unlawful or improper including, but not limited to, any of the following, to the extent that they might impact or be related to the business operations of Safari or might have an effect on the ability of any Employee to perform his or her obligations:

- committing a criminal offence;
- failing to comply with a material contractual and/or legal obligation to Safari;
- behaving improperly including, but not limited to, financial or non-financial mismanagement;
- engaging in or being complicit in fraud, bribery or corruption, or behaving unethically;
- materially endangering the health and/or safety of any person;
- seriously harming the natural environment;
- discriminating against an Employee in terms of relevant legislation;
- discriminating based on someone's race, religion, natural origin, sex, sexual orientation or disability or creating a hostile work environment by making racial, sexist, homophobic or other derogatory comments about someone's race, religion, natural origin, sex, sexual orientation or disability;
- failure to comply with the Safari Code of Ethics and Conduct and the policies and procedures issued in terms of such Code; or
- concealing any matter referred to above.

"Occupational Detriment" occurs in relation to the workplace, where an Employee is, as a result of disclosing any Improper Conduct:

- subjected to disciplinary action;
- dismissed, suspended, harassed, intimidated, or demoted;
- transferred involuntarily;
- refused a transfer or promotion;
- subjected to conditions of employment or retirement that were changed to his/her disadvantage;
- refused a reference or given an adverse reference;
- denied an appointment to any service or position;
- threatened with any of the above actions; or
- otherwise adversely affected in respect of his/her service or position, including employment opportunities and work security.

"Safari" means Safari Investments RSA Limited and its direct and indirect subsidiaries. For the purpose of this definition, subsidiary means a company controlled by a holding company.

3. Scope

This policy applies to all Employees of Safari Investments RSA Ltd and its subsidiaries and includes:

- Executive and non-executive directors, shareholders and the company secretary
- Full-time, part-time or temporary employees
- Any independent contractors operating as representatives of Safari
- Any third party associated with Safari by virtue of their profession and engagement with Safari
- The spouse, child or direct beneficiary of any of the above
- A supplier of Safari or the employee of such supplier
- Any legal entity controlled by, benefitting from or acting on the instruction of any of the persons listed above

4. Policy objectives

A culture of transparency and accountability is essential in order to prevent unlawful and unethical behaviour, and to address such behaviour when it does occur. Safari is committed to conducting its business with honesty, integrity and fairness, and expects all Employees to maintain high standards in accordance with its Code of Ethics.

The purpose of this policy is:

- To encourage and make provision for Employees to safely, and free from fear of any Occupational Detriment, report suspected Improper Conduct;
- To reassure Employees that their concerns will be taken seriously and investigated as appropriate and that their confidentiality will be safeguarded;
- To reassure Employees that when they report suspected Improper Conduct in good faith, they will have the necessary protection against Occupational Detriment;
- To set out the investigation process for genuine disclosure of Improper Conduct for appropriate action; and
- To, in accordance with applicable legislation, support a culture where Employees can disclose information or concerns relating to Improper Conduct in the workplace and establishes safe, confidential and effective mechanisms for such disclosure.

5. Whistleblowing procedure

Employees can disclose Improper Conduct by following the Whistleblowing process in this Policy. There are two avenues available for reporting a concern:

- **Reporting to your direct manager** All Employees should, in the first instance, raise their concerns verbally or in writing with their immediate manager, divisional manager or a member of the executive team. If any Employee feels uncomfortable about reporting a matter to their immediate manager (due to the seriousness and/or sensitivity of the issue) they may use the second reporting option provided.
- **Reporting to the Independent Whistleblowing hotline** Employees may report their concerns anonymously using the independent Whistleblowing Hotline. All reports, whether made anonymously or not, will be treated as confidential and the identity of the Employee will be safeguarded.

Hotline: 087 086 9755

safarihotline@theharvestgroup.co.za

The party responsible for considering the disclosure must acknowledge receipt of the disclosure in writing, unless the identity of the reporter is unknown.

6. Allegations

When an Employee makes a disclosure of Improper Conduct and the disclosure is not made maliciously or in bad faith, such disclosure will be a Protected Disclosure under this policy. Mischievous, intentionally false and malicious reporting, or reporting done for personal gain or otherwise, will be viewed as misconduct on the part of

the reporter. The reporter will not be protected in terms of this policy, and may be subject to disciplinary and/or legal action.

The PDA makes it an offence to provide false information intentionally and where this result in harm, a conviction may result in a fine, or imprisonment or both.

7. Escalation and reporting on disclosures

Dealing with disclosures of Improper Conduct is the responsibility of the board, who may delegate this responsibility to a committee consisting of at least the Chairman of the board, the Chairman of the Audit & Risk Committee, and the CEO.

Depending on the nature and materiality of the concern, a formal investigation may be conducted by either external or internal parties or bodies; or be referred to the South African Police Services; or form the subject of an independent inquiry.

The board, or its delegated committee, is then responsible for giving a report on the disclosure brought to their attention and the outcome of any investigation or resolutions thereon to the Social & Ethics Committee and the Audit & Risk Committee.

Relevant Contact Details

Chairperson of Audit & Risk Committee

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