









Transnet Group

Whistle Blowing Policy

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Policy Owner	General Manager: Transnet Integrity Management Unit
Signature	
Policy Sponsor	Group Chief Legal Officer
Signature	
Date Approved	28 November 2025

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Recommended by Policy Owner and Policy Sponsor:

I hereby acknowledge that a search has been conducted and that the Policy is not duplicated or in conflict with any other Transnet Policies.

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Policy Owner	Erich Neethling	General Manager: Transnet Integrity Management Unit		31 March 2026	Erich.Neethling@transnet.net	011 308 4887/ 063 764 9050
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Final Approval

Transnet Board of Directors

Name of Committee

Date Approved

Summary of Version Control

Version Number	Effective Date	Summary of Changes
6		Changed Policy Sponsor from Group Chief Security Officer to Group Chief Legal Officer
		Removed paragraph 5.1.13 e. that stated: "An alternative channel to the internal hotline is that of the Department of Public Enterprises (DPE) who also have a dedicated whistle blower hotline. This can be accessed at WhatsApp: 0860 004 004, Email: dpe@behonest.co.za, Online: behonest.co.za and lastly a Toll-free number 0801 212 136"
		Amended paragraph 7.1.1 to state: "7.1.1 File a written complaint with the Head of Investigations. Should the complaint be in respect of the Head of Investigations, it to be directed to the Chief Legal Officer. Any complaint of victimisation and/or retaliation will be promptly investigated by Investigations and appropriate remedial measures will be taken if allegations of retaliation are deemed to be founded;"
		Changed in paragraph 8.1 from Group Security to Transnet Integrity Management Unit
		Amended paragraph 10.1.1 to state: "Transnet Ethics Commitment Statement;"
		Amended paragraph 10.1.12 to state: "DPEP and FPEP Policy;"
		Amended paragraph 10.1.13 to state: "Lifestyle Assessment Policy;"
		Amended appendix A paragraph 1.1 to state: "The Anonymous Hotline telephone number 087 059 4399;"
		Amended appendix A paragraph 1.2 to state: "WhatsApp Number 063 786 7403;"
		Amended appendix A paragraph 1.3 to state: "A dedicated E-mail address reportit@mberiskconsulting.co.za "
		Amended appendix A paragraph 1.4 to state: "A Please call me back number *120*0637867403; and"

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1. BACKGROUND

- 1.1 Transnet is committed to having an effective and responsive whistle blowing management system. This system is founded and supported by a comprehensive Whistle blowing policy. It is the purpose of this policy to communicate Transnet's stance on whistle blowing and its commitment to whistle blowers. The policy provides clear, unambiguous guidelines about how and where to report unethical conduct. The aim of the whistle blowing policy is ultimately to create a culture of openness and accountability, where employees can report knowledge of misconduct without fear of retaliation or occupational detriment. It also communicates to employees that Transnet takes any wrongdoing seriously and is committed to identifying and addressing it.
- 1.2 This policy has also been developed as a response and in accordance with the Transnet Memorandum of Incorporation, legislative requirements and obligations set out in the Protected Disclosures Act No. 26 of 2000 ("the PDA") and the Companies Act No. 71 of 2008.
- 1.3 In terms of the PDA, a provision is to be made for employees to report unlawful or irregular conduct by employers and employees and places an obligation on employers to provide protection to employees who blow the whistle and report such conduct and/or acts.
- 1.4 The PDA further provides protection to whistle blowers for any disclosure made without malice and in good faith. Therefore, Transnet is committed to creating a framework within which disclosures can be made without fear, victimisation and/or subsequent discrimination and seeks to do so through the adoption of this policy.
- 1.5 Transnet makes use of an external service provider to receive reports of wrongdoing. This service provider is an independent third party who receives the information on behalf of Transnet. Transnet only communicates to whistle blowers through the service provider where they have elected to remain anonymous. The adoption of this policy further reinforces Transnet's commitment to the above legislative requirements. The whistle blowing contact particulars/tools for reportable incidents can be found in Appendix A to this policy. Any changes pertaining to service providers and the reporting tools will be captured in appendix A.

- 1.6 Transnet encourages protected disclosures to be made to officials as listed at paragraph 5.1.12 below. As such the availability of the above-mentioned whistle blowing mechanisms will be routinely publicised to employees, be published on Transnet's website and communicated to external stakeholders. Whistle blowing takes courage and conviction. Many employees are not familiar with the methods associated with blowing the whistle. It is recommended that individuals who intend on reporting wrongdoing should seek advice on how to blow the whistle. Transnet in its commitment to protect whistle blowers encourage individuals to contact Group Investigations or Group Legal to obtain necessary advice and support prior to the individual reporting any form of wrongdoing.
- 1.7 The effective implementation of this policy will encourage a culture of trust and confidence between the employer and employee, thereby encouraging employees including external stakeholders to report suspicious activities within Transnet at an early stage. This will also increase stakeholder confidence in Transnet as an organisation with zero-tolerance to fraud, corruption and misconduct.

2. PURPOSE

- 2.1 The purpose of this Policy is to provide a framework within which whistle blowers can make disclosures, where there are reasonable grounds for believing that there is impropriety within Transnet.
- 2.2 As a secondary objective, the policy is meant to assist in:
- 2.2.1 Building employee, employer, customer and supplier loyalty by identifying and eliminating unethical practices within Transnet;
 - 2.2.2 Creating an organisational culture wherein suspicious activities and irregularities can be reported safely, without the fear of reprisal or victimisation;
 - 2.2.3 The eradication of criminal and other irregular conduct within Transnet in the conduct of business;
 - 2.2.4 Providing guidance to employees on how to report possible unlawful and unethical conduct, or breaches of company policies which include all aspects of criminal and other irregular conduct;
 - 2.2.5 Providing information on how an employee will be protected, and how to escalate a matter if they are subjected to occupational detriment;
 - 2.2.6 Providing information on the remedies and right of recourse available to employees if they are subjected to occupational detriment or other detriments, and

2.2.7 To ensure that Transnet complies with the PDA and PDAA.

3. DEFINITIONS

Corruption

means the offence of corruption in terms of section 3 of *Preventing and Combatting Corrupt Activities Act 12 of 2004* whereby any person directly or indirectly

- (a) accepts, agrees or offers to accept any gratification from any other person, whether for the benefit of himself or herself or for the benefit of another; or
- (b) gives, agrees or offers to give to any person any gratification, whether for the benefit of that person or the benefit of another person, in order to act, personally or by influencing another person so to act, in a manner –
- (c) That amounts to the illegal, dishonest, unauthorised, incomplete or biased misuse or selling of information or material acquired in the course of the exercise, carrying out a performance of any powers, duties or functions arising outside of a constitutional, statutory, contractual or any other legal obligation;
- (d) That amounts to the abuse of a position of authority; a breach of trust; the violation of a legal duty or set of rules; achieving an unjustified result; or any other unauthorised or improper inducement to do or not to do anything.

Disclosure

in terms of the *Protected Disclosure Amended Act 5 of 2017* means any disclosure of information regarding any conduct of an employer, or an employee or of a worker of that employer, made by any employee or worker who has reason to believe that the information concerned shows or tends to show one or more of the following:

- (a) That a criminal offence has been committed, is being committed or is likely to be committed;
- (b) That a miscarriage of justice has occurred, is occurring or is likely to occur;
- (c) That a person has failed, is failing or is likely to fail to comply with any legal obligation to which the person is subject;

- (d) That the environment has been, is being or is likely to be damaged;
- (e) That the health or safety of an individual has been, is being or is likely to be endangered; and
- (f) Unfair discrimination as contemplated in Chapter II of the *Employment Equity Act, 1998 (Act No. 55 of 1998, Promotion of Equality and Prevention of Unfair Discrimination Act, 2000 (Act No, 4 of 2000)*; or that any matter referred to in **paragraphs (a) to (f)** above has been, is being, or is likely to be deliberately concealed.

Employees

means persons employed on indefinite contracts (permanent employees), fixed- term contract, on temporary or casual terms or employed as a worker by Transnet (including bargaining and non-bargaining units) and any other person who assists or assisted with carrying on or conducting the business of Transnet, excluding independent contractors.

EXCO

means members of the Transnet's Group Executive Committee.

Fraud

means any unlawful and intentional misrepresentation with the intention to prejudice another person or organisation.

Impropriety

in terms of the Protected Disclosure Act means any conduct which falls within any of the categories referred to in paragraphs (a) to (g) of the definition of "***Disclosure***", irrespective of whether or not:

- (a) The impropriety occurs or occurred in the Republic of South Africa or elsewhere; or
- (b) The law applying to the impropriety is that of the Republic of South Africa or of another country.

Occupational detriment

in terms of the *Protected Disclosure Amended Act 5 of 2017* victimisation, harassment, unfair labour practices or unfair dismissal in the working environment.

<i>PDA</i>	means the <i>Protected Disclosures Act No 26 of 2000</i> .
<i>PDAA</i>	means the <i>Protected Disclosure Amendment Act No 5 of 2017</i> .
<i>Protected disclosure</i>	<p>in terms of the Protected Disclosure Act means a <i>disclosure</i> made to:</p> <ul style="list-style-type: none"> (a) Legal adviser (Section 5) whose occupation is to give legal advice and with the object to obtain legal advice; (b) An employer (Section 6) in accordance with the procedure prescribed for reporting or remedying impropriety; (c) A member of Cabinet or of the Executive Council (Section 7) being an individual or body of members appointed in terms of legislation by a member of Cabinet or Executive Council of the province or an organ of state falling within the area of responsibility of the member concerned; (d) Any person or body who works for the Public Protector or Auditor General (Section 8), but does not include a disclosure – <ul style="list-style-type: none"> i. In respect of which the employee concerned commits an offence by making that disclosure; or ii. Made by a legal adviser to whom the information concerned was disclosed in the course of obtaining legal advice.
<i>Theft</i>	means the unlawful and intentional appropriation of property which belongs to another with the intention of permanently depriving the person of the property.
<i>Transnet</i>	means Transnet SOC Limited and all its Operating Divisions (OD's) and Specialist Units (SU's).
<i>Unethical Conduct</i>	means any conduct which represents a wrongdoing of the behavioural standards noted or described in the Transnet Code of conduct and is in contravention of laws or regulations, which includes criminal, activity,

misconduct, discrimination, harassment, conflicts of interest, theft, fraud, property damage, corruption bribery etc.

Whistle- Blower

means an employee or any other person who reports alleged or potential unethical conduct to Transnet SOC Limited in good faith through the reporting channels.

4. SCOPE AND APPLICATION

- 4.1 This policy applies to all current and former permanent employees, fixed-term contractors, employees on temporary or casual terms or worker employed by Transnet (including bargaining and non-bargaining units) and any other person who assists or assisted with carrying on or conducting business at Transnet including suppliers, consultants, business partners, board members and Transnet agents.
- 4.2 To give effect to these provisions, all third-party agreements must be amended to reflect and confirm the duty to disclose irregular or illegal conduct and activities in a similar manner as employees.
- 4.3 The Policy is designed to deal with disclosures by employees and third parties.
- 4.4 This policy covers all disclosures made in good faith relating to:
 - 4.4.1 Unlawful civil or criminal offence;
 - 4.4.2 Failure to comply with statutory obligations/requirements;
 - 4.4.3 Financial Misconduct;
 - 4.4.4 Health and Safety Risks;
 - 4.4.5 Environmental Damage;
 - 4.4.6 Unfair discrimination;
 - 4.4.7 Corruption and Misconduct including bribery;
 - 4.4.8 Attempts to suppress or conceal any information relating to any of the above;
 - 4.4.9 Victimization as a result of disclosing the above provisions.
- 4.5 The policy does not apply to personal grievances, which will be dealt with under the Transnet's grievance procedures.
- 4.6 This policy must be read with the relevant policies addressing grievances, disciplinaries and unfair labour practice.

5. POLICY STATEMENT

5.1 Disclosures

- 5.1.1 Due to the prevalence of corruption and wrongdoing in public institutions, and in a quest to minimise the risk of fraud, corruption and other unethical conduct by employees and third parties and in strict compliance with the PDA, all employees, suppliers, consultants, business partners, board members and Transnet agents are required and obligated to disclose any information pertaining to any of the following:
- a) Criminal or other irregular conduct that has been committed, or is being Committed, or is likely to be committed;
 - b) A person has failed, or is failing, or is likely to fail to comply with any legal obligation to which the person is subject to;
 - c) That a miscarriage of justice has occurred, is occurring or is likely to occur;
 - d) That the health or safety of an individual has been, is being or is likely to be endangered;
 - e) That the environment has been, is being or is likely to be damaged;
 - f) Unfair discrimination based on race, gender and disability;
 - g) That any aspect of the Transnet Code of Ethics is / has been transgressed; or
 - h) That any matter referred to in paragraphs (a) to (g) above has been, is being, or is likely to be deliberately concealed.
- 5.1.2 Such disclosures shall be where there are reasonable grounds for believing that a misconduct has or is likely to take place.
- 5.1.3 Transnet shall put in place appropriate systems to facilitate disclosures of misconduct.
- 5.1.4 Should any of the above conduct be discovered or suspected by the employee, the employee is required and obligated to immediately report to any of the available Transnet's Whistleblowing Mechanisms specified in **paragraph 1.5 above**.
- 5.1.5 The ability for Transnet to take action requires as much information about the transgressions/illegalities as possible. Whistle blowers are therefore encouraged to provide information which indicates who is involved in the wrongdoing, what is the nature of the wrongdoing, when the wrongdoing

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- occurred, where it occurred and how it happened. It would also be of great assistance if the person making the report could indicate how the information came to their attention.
- 5.1.6 Transnet shall ensure that a whistle-blower who makes a disclosure in good faith is not penalised, victimised or suffers any adverse treatment as a result of the disclosure.
- 5.1.7 Should anyone within Transnet attempt to retaliate against or victimise a whistle blower for making a disclosure or any employee for assisting with an investigation, the employee with face disciplinary action.
- 5.1.8 To that end, Transnet will take reasonable steps to ensure that employees that report their suspicions in good faith, will be protected from any reprisals as a result of such disclosure, which include, but is not limited to:
- a. Being subjected to any disciplinary action;
 - b. Being dismissed, suspended, demoted, harassed, or intimidated;
 - c. Being transferred against his or her own will;
 - d. Being refused transfer or promotion;
 - e. Being subjected to a term or condition of employment or retirement which is altered or kept altered to his or her disadvantage;
 - f. Being refused a reference, or being provided with an adverse reference, from his or her employer;
 - g. Being denied appointment to any employment, profession or office;
 - h. Being threatened with physical harm directly or indirectly or conditionally;
 - i. Being threatened with any of the actions referred above; or
 - j. Being adversely affected in respect of his or her employment, profession or office, including employment opportunities, work security and the retention or acquisition of contracts to perform work or render services.
- 5.1.9 Where a whistle-blower who has made a disclosure suffers victimisation, Transnet shall take appropriate action to ensure the immediate alleviation of the victimisation of the whistle-blower and appropriate action against the person or employee victimising the whistle-blower.
- 5.1.10 Disclosures of wrongdoing shall, without undue delay, be considered and where appropriate, investigated swiftly and corrective action taken. Received reports are sorted and prioritized based on risk (i.e., the likelihood of the wrongdoing and its potential impact). Aspects for consideration include:

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- 5.1.10.1 Is the reported wrongdoing within the scope of the whistleblowing policy? If not, does it need to be dealt with in accordance with another procedure or addressed in another way?
- 5.1.10.2 Is the reported wrongdoing a criminal offence? Does the wrongdoing need to be referred to law enforcement or regulatory authorities?
- 5.1.10.3 When did the wrongdoing happen or is it about to happen?
- 5.1.10.4 Is there an immediate need to stop or suspend business activities?"
- 5.1.10.5 Investigations are conducted without bias. The investigation process is executed in such a manner to withstand administrative, operational and legal review. Investigations also maintains an audit trail relating to investigation activities. Investigations considers any subject of a report as being presumed innocent. The investigation also protects any information that could identify any subject of a report.
- 5.1.11 An employee who intentionally fails and or refuses to report any allegation falling within the ambit of this policy shall be guilty of misconduct and such misconduct shall be dealt with in line with the Transnet disciplinary procedures.
- 5.1.12 An employee in terms of Section 9B of the PDAA, who makes a malicious report or discloses false information, knowing that the information is false or is ought to have reasonably known that the information is false shall be guilty of misconduct and a criminal offense. Such misconduct and/ or offense shall be dealt with in line with the Transnet disciplinary procedures and the employee may be prosecuted. If a whistle blower is found guilty in this regard, he or she will be liable for a fine or imprisonment up to two years, or both.
- 5.1.13 Furthermore, employees may further make protected disclosures in writing to the following officials or channels:
- a. Any Member of the Board;
 - b. Any member of EXCO;
 - c. Group or Divisional Legal; and
 - d. Members of Transnet Investigations and Fraud Risk Management unit (also known as Forensics).
- 5.1.14 Transnet commits to protect the identity of all whistle-blowers at all times as required in terms of the PDA, unless the whistle blower waives such a right. This policy also does not restrict reporting based on any contractual obligations stemming from aspects such as non-disclosure agreements or

clauses pertaining to conditions of confidence regarding commercial and or employee relations.

5.1.15 Employees making protected disclosures in good faith as prescribed in terms of the PDA and the PDAA are immune from criminal, civil and administrative liability unless the employee making the disclosure, engaged in acts of misconduct and the misconduct is revealed in their disclosure or during the investigation.

5.2 Culture of Openness

5.2.1 Transnet commits itself to encouraging a culture that promotes openness. This will be demonstrated by inter alia:

- a. Promoting a culture where suspicions of irregularities can be reported safely, without fear of reprisal or victimisation;
- b. Providing clear guidelines for the disclosure of such information;
- c. Promoting responsible disclosure of information by employees relating to all aspects of criminal and other irregular conduct in the workplace;
- d. Ensuring that employees are made aware of the contents and requirements of this policy; and
- e. Ensuring that there is an effective response to all reported incidents and proper feedback mechanism from all the Whistle blowing Hotline channels.
- f. Transnet is committed to continuously monitor and improve the whistle blowing management system. This is done through constant monitoring of the quality of whistle blower reports received as well as constant feedback to Whistle blowers where they have not reported wrongdoing anonymously.

6. INFORMATION REPORTABLE TO WHISTLE BLOWERS

6.1 Feedback will be provided to the Whistle Blower via the communication channels of the independent service provider. This will be done in writing or verbally by the service provider. Transnet will also inform the employee or worker, in writing, when it is unable to make a decision on the way forward within 21 days. In terms of the PDAA, the whistle-blower will be provided with feedback within 21 days of the disclosure or as soon as reasonably possible of the following:

- a. Whether the disclosure will be investigated and if so the possible time frame within which the investigation will be completed;
- b. If the decision is not to investigate, the reason for that decision.

6.2 Once the investigation is complete the whistle blower will be informed of

the outcome subject to personal legislative confidentiality requirements through the Whistle blowing Hotline Channels.

- 6.3 If the whistle blower has made the disclosure anonymously, provisions under 6.1 and 6.2 are not applicable.
- 6.4 In terms of the Protection of Personal Information Act the whistle blower will be notified of any unauthorised access to their personal information if their identity and contact details are disclosed.
- 6.5 Group Investigations will, in line with international best practice, on a periodic basis, publish statistics Transnet wide on internal communication channels about the number of investigations concluded as well as the category in which they fall. The purpose of publishing such statistics is four-fold, namely:
 - 6.5.1 Sending the message that unethical behaviour is not acceptable;
 - 6.5.2 That the organisation does not tolerate such behaviour;
 - 6.5.3 Anonymous reporters obtain assurance that their reports have been investigated; and
 - 6.5.4 It serves as a deterrent to would-be perpetrators of the organisation's ethical standards.

7. WHISTLE BLOWER REMEDIES AND RIGHT OF RECOURSE

- 7.1 Employees may make use of the following remedies if they are subjected to occupational detriment and/or other form of prejudice as a result of making a protected disclosure:
 - 7.1.1 File a written complaint with the Head of Investigations. Should the complaint be in respect of the Head of Investigations, it to be directed to the Chief Legal Officer. Any complaint of victimisation and/or retaliation will be promptly investigated by Investigations and appropriate remedial measures will be taken if allegations of retaliation are deemed to be founded;
 - 7.1.2 File a grievance in terms of the Grievance Policy;
 - 7.1.3 Refer unfair labour practice dispute to the Transnet Bargaining Council;
 - 7.1.4 Approach the Commission for Conciliation, Mediation and Arbitration (CCMA);
 - 7.1.5 Approach a Labour court in terms of Labour Relations Act;
 - 7.1.6 Report direct or indirect or conditional or veiled threats of physical harm to the South African Police Services (SAPS), relevant line manager and Transnet Group Security as per the Personnel Protection Services Policy;
 - 7.1.7 Apply for a Protection Order against harassment in terms of the Protection

from Harassment Act;

- 7.1.8 Approach a Court having jurisdiction and claim for compensation of damages suffered as a result of the detriment. The recourse provided for in term of the Companies Act in regard to compensation is in accordance with the presumption that the conduct or threat is presumed to have occurred both support the protection afforded.
- 7.2 Transnet EXCO should endeavour to establish a mechanism and policy to reward whistle blowers who blow the whistle and the matters reported result in successful prosecution and/or recovery of funds lost. This should be on a discretionary basis and not to create an expectation for an incentive to comply with a legal duty to report wrongdoing.

8. TRAINING

- 8.1 The Transnet Integrity Management Unit as part of the yearly roll out of the Fraud Risk Management Plan will provide for the training of managers and others who may receive whistle-blower reports about how to respond to them. This is especially in the case of line managers being the recipients of reports of misconduct. Transnet will therefore ensure that all line managers are skilled at handling confidential reports and protecting the whistle blower. Employees fear victimisation and will be more likely to report misconduct if they are confident that their reports will be handled confidentially.
- 8.2 General communication initiatives will also be conducted yearly and will focus on the following:
 - 8.2.1 The available reporting channels;
 - 8.2.2 How to report;
 - 8.2.3 What to report; and
 - 8.2.4. Available protective measures in place for those who report misconduct.

9. ROLES AND RESPONSIBILITIES

- 9.1 Accountable :All Employees of Transnet
- 9.2 Responsible :Transnet Line Managers
- 9.3 Monitoring and Support :Integrated Assurance Providers
- 9.4 Policy Owner :Head of Investigations
- 9.5 Policy Sponsor : Group Chief Legal Officer

10. RELATED INFORMATION AND REFERENCES

- 10.1 This policy should be read in conjunction with inter alia, the following supporting guidelines and policies:

INTERNAL REGULATORY REQUIREMENTS:

- 10.1.1 Transnet Ethics Commitment Statement;
- 10.1.2 Disciplinary Code and Procedure;
- 10.1.3 Transnet Anti-Fraud and Corruption Policy;
- 10.1.4 Transnet Procurement Procedures Manual;
- 10.1.5 Transnet Recruitment & Selection Policy;
- 10.1.6 Group Compliance Policy;
- 10.1.7 Group Legal Policy;
- 10.1.8 Grievance Policy;
- 10.1.9 Electronic Communications Policy;
- 10.1.10 Information Security Policy;
- 10.1.11 Integrated Risk Management Policy;
- 10.1.12 DPEP and FPEP Policy;
- 10.1.13 Lifestyle Assessment Policy;
- 10.1.14 Declaration of Interest and Related Party Disclosures Policy;
- 10.1.15 Personnel Protection Services Policy

EXTERNAL REGULATORY REQUIREMENTS DOCUMENTS:

Transnet recognises the importance of complying with all applicable regulatory requirements as reflected in the Transnet regulatory universe. Specific reference is made to the following key legislation:

- 10.1.16 King IV Code of Corporate Governance Principles;
- 10.1.17 United Nations Convention against Corruption (2004);
- 10.1.18 ISO 37002:2021 Whistle-blowing Management Systems Guidelines;
- 10.1.19 Companies Act, 71 of 2008;
- 10.1.20 Public Finance Management Act, 1 of 1999;

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- 10.1.21 The Constitution of the Republic of South Africa, 1996;
 - 10.1.22 Prevention and Combating of Corrupt Activities Act, 12 of 1994;
 - 10.1.23 The Prevention of Organised Crime Act, 121 of 1998;
 - 10.1.24 Protection of Constitutional Democracy Against Terrorist and Related Activities Act, 33 of 2004;
 - 10.1.25 Criminal Procedure Act, 1977 (Act 51 of 1977);
 - 10.1.26 Promotion of Administrative Justice Act, 3 of 2000;
 - 10.1.27 Protection of Personal Information Act, 4 of 2013;
 - 10.1.28 Labour Relations Act, 66 of 1995;
 - 10.1.29 Protection from Harassment Act, 17 of 2011;
 - 10.1.30 Protected Disclosures Act, 26 of 2000; and
 - 10.1.31 Protected Disclosures Amendment Act, 5 of 2017.

11. RETENTION AND CONFIDENTIALITY OF DOCUMENTS

- 11.1 In terms of the Transnet Retention schedule and the Records Management Policy, Transnet is obligated to retain evidence and information reported by whistle blowers for a period of 5 years.
- 11.2 In terms of the Protection of Personal Information Act, all information including personal information obtained from whistle blowers or collected during investigations will be treated as confidential and will only be used for the purpose it was collected for.

12. FINANCIAL IMPLICATIONS

- 12.1 There are no financial implications relating to the implementation of this policy, except for the costs pertaining to the appointment of the service provider to manage the Fraud Case Management System and the Whistle-blowing Hotline.

13. EXCLUSIONS

- 13.1 This policy does not cover the reporting of employment or personal grievances and general complaints which should be dealt with in terms of the Transnet Grievance Policy and/or any other process.

14. REQUEST TO DEVIATE FROM POLICY

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- 14.1 Where material and compelling circumstances necessitate a deviation(s) from a particular provision(s) of this policy, written submissions shall be sent to the Group Chief Executive, who shall have full authority to grant such request, in whole or in part, or to refuse same.

15. ADMINISTRATION AND REVIEW

- 15.1 The Whistle blowing policy will be reviewed every 5 years or as and when there is a material change in the legislative framework pertaining to whistleblowing, whichever comes first.

16. NON-COMPLIANCE

- 16.1 Any breach of this policy will be seen in a very serious light. Employees who do not conform to the policy or principles & standards within this policy may be subject to disciplinary action in terms of the applicable Transnet disciplinary processes and procedures.
- 16.2 All suspected incidents of contraventions of this policy should be reported to Transnet's management, or the Anonymous Help Desk Hotline (**0800 003 056**) or members of the Investigations Unit.

APPENDIX A

1. The following whistle blowing channels are available to report incidents:
 - 1.1 Toll Free No: 0800 003 056
 - 1.2 Email Address: Transnet.Reportit@outlook.com
 - 1.3 SMS: 063 786 7403
 - 1.4 Please Call me number: *120*0637867403
 - 1.5 A dedicated Website:
<https://whistleblowersoftware.com/secure/Transnet>