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WHISTLEBLOWING AND PROTECTED DISCLOSURES POLICY

Last updated 12 September 2026

Policy reference: POL-ETH-05
Policy owner: Ethics Officer / Legal
Applies to: employees, workers, contractors, suppliers, clients and members of the public
Governing law: Protected Disclosures Act 26 of 2000

RVZ International Group (Pty) Ltd ("RVZ") competes and succeeds without corrupt, deceptive or retaliatory conduct. This policy provides safe routes for anyone to raise a concern about unlawful, irregular, dangerous, unethical or concealed conduct at or connected to RVZ, and it protects people who raise such concerns in good faith. It gives effect to the Protected Disclosures Act 26 of 2000 ("PDA") as amended by the Protected Disclosures Amendment Act 5 of 2017, and to the reporting duties placed on companies and their people by the Companies Act 71 of 2008, the Prevention and Combating of Corrupt Activities Act 12 of 2004 ("PRECCA") and the Occupational Health and Safety Act 85 of 1993 ("OHSA").

1. Who this policy protects

1.1 The PDA protects an employee and, since 2017, a worker — which includes independent contractors, consultants, agents and persons supplied by a temporary employment service — who makes a protected disclosure. RVZ extends the same non-retaliation commitment, as a matter of policy, to former employees, job applicants, suppliers, clients, event guests, travellers, candidates and members of the public who raise a concern with us in good faith.

1.2 Nothing in any employment contract, non-disclosure agreement, settlement or supplier contract with RVZ prevents, or may be used to penalise, a protected disclosure. Any term purporting to do so is void under PDA section 2(3).

2. What you can report

2.1 A disclosure concerns any of the "impropriety" categories in PDA section 1, namely information showing or tending to show that:

- a criminal offence has been, is being or is likely to be committed (including fraud, theft, bribery or corruption under PRECCA, and money laundering under the Financial Intelligence Centre Act 38 of 2001);
- a person has failed, is failing or is likely to fail to comply with a legal obligation (for example under the Consumer Protection Act, POPIA, the Basic Conditions of Employment Act, the Employment Services Act or tax legislation);
- a miscarriage of justice has occurred, is occurring or is likely to occur;
- the health or safety of an individual has been, is being or is likely to be endangered (including OHSA contraventions at an event, site or client premises);
- the environment has been, is being or is likely to be damaged;
- unfair discrimination as contemplated in the Promotion of Equality and Prevention of Unfair Discrimination Act 4 of 2000 or the Employment Equity Act 55 of 1998; or
- any of the above matters has been, is being or is likely to be deliberately concealed.

2.2 Examples in RVZ's business include: inflated or fictitious supplier invoices; commissions or gifts offered to influence a placement, venue or supplier choice; misrepresentation to a consumer or in advertising; misuse of client, candidate or guest personal information; unsafe rigging, electrical or crowd arrangements at an event; falsified B-BBEE, tax or safety documents; and pressure on staff to override a control.

2.3 Personal workplace grievances (for example about your own pay, performance rating or a disagreement with a manager) are dealt with under the Grievance and Fair Procedure Policy, and harassment complaints under our Prevention and Elimination of Harassment policy (POL-PEO-03). If a grievance also reveals an impropriety in 2.1, it is treated as a protected disclosure as well.

3. How to report

3.1 Internal routes. You may report through any of the following, and you may bypass a route that is conflicted or is the subject of your concern:

- your line manager or any senior manager;
- Human Resources;
- the Ethics Officer / Legal by email to ryan@rvzgroup.co.za , marked "Protected disclosure";
- the Information Officer (for privacy or data-related concerns), the OHS Manager (for safety concerns) or Finance (for financial irregularity);
- in writing by post to our registered address, addressed to the Chief Executive Officer and marked "Private and confidential — protected disclosure".

3.2 Please include what happened, when, where, who was involved, any evidence or witnesses, whether you have raised it elsewhere, and how we may contact you if you are willing to be contacted. You do not need proof; a reasonable belief that the information is substantially true is enough.

3.3 A disclosure made in good faith to RVZ as employer is a protected disclosure under PDA section 6.

4. Anonymous and confidential reports

4.1 Anonymous reports are accepted and assessed on the facts available. An anonymous reporter may find it harder to receive feedback, and we cannot protect a person whose identity we do not know, so we encourage you to identify yourself to at least one trusted route.

4.2 Your identity and the content of your report are held in confidence on a strict need-to-know basis and processed under POPIA. Absolute secrecy cannot be promised where fairness to a person accused of misconduct, a court order, a regulator's lawful demand or the law itself requires disclosure; where that arises we will tell you first wherever it is lawful and safe to do so.

5. What happens after you report

5.1 Acknowledgement. We acknowledge an identified report within 5 business days. PDA section 3B further requires an employer that receives a disclosure to decide, within 21 days, whether to investigate it or to refer it to a more appropriate person or body, and to inform the discloser in writing of that decision, or, where a decision cannot be reached in that time, to say so and give a timeframe of up to six months with updates at reasonable intervals.

5.2 Triage and assignment. Every report is risk-triaged and assigned to a competent, impartial investigator who is free of material conflict, under written terms of reference (POL-ETH-06 Fraud Response and Internal Investigations). Where the report concerns a director or executive, the investigation is escalated above that person or referred to an external professional.

5.3 Containment. Where harm may be continuing (a safety hazard, an ongoing loss, an active data compromise), immediate containment measures are taken before the investigation concludes.

5.4 Investigation standards. Evidence is lawfully preserved with a chain of custody. Surveillance, device searches and personal-data processing are used only where necessary, proportionate and approved by Legal and the Information Officer. A person implicated receives a fair opportunity to respond before any adverse finding, subject to lawful safeguards to protect the discloser and evidence.

5.5 Outcome. We will tell you, so far as the law and the rights of others allow, whether the matter was substantiated and what corrective action was taken. Criminal, civil, employment, regulatory and recovery consequences are decided separately and referred to the proper authority, including SAPS, the Hawks or the National Prosecuting Authority where an offence is disclosed.

5.6 Records. A register of disclosures, investigation records and corrective-action tracking is maintained, access-controlled according to sensitivity, and trend information (not identities) is reported to executive management and reviewed at least annually.

6. Protection against occupational detriment and retaliation

6.1 No person may be subjected to an occupational detriment on account of having made a protected disclosure (PDA section 3). Occupational detriment includes being disciplined, dismissed, suspended, demoted, harassed, intimidated, transferred against one's will, refused a transfer or promotion, subjected to altered terms of employment, refused a reference or given an adverse reference, denied appointment, threatened with any of these, or otherwise adversely affected in employment, opportunities or work security; and, since 2017, being subjected to civil claims for an alleged breach of confidentiality arising from the disclosure.

6.2 RVZ additionally prohibits exclusion, retaliatory performance management, malicious exposure of a reporter's identity, and pressure to withdraw a report or to settle, whether directed at the reporter, a witness or a person supporting them.

6.3 Retaliation is serious misconduct that will itself be investigated and disciplined, up to dismissal, and for a supplier or representative may lead to suspension, termination and referral to an authority.

6.4 Your remedies. A dismissal for making a protected disclosure is automatically unfair under section 187(1)(h) of the Labour Relations Act 66 of 1995, and any other occupational detriment is an unfair labour practice (PDA section 4(2)); you may refer such a dispute to the CCMA or the Labour Court, which may award compensation of up to 24 months' remuneration. Under PDA section 4(1A) and 4(1B) you may also approach any court for appropriate relief, including damages, and you may request a transfer on the same terms under section 4(3). Under section 9A of the Act as amended, an employer that intentionally subjects a person to an occupational detriment commits an offence.

7. External and regulatory disclosures

7.1 Nothing in this policy, in any contract, or in any instruction from anyone at RVZ prevents you from making a protected disclosure to a person or body outside RVZ where the PDA protects it. Protected external routes include:

- a legal adviser , for the purpose of obtaining legal advice (PDA section 5);
- a member of Cabinet or an Executive Council , where applicable (section 7);
- the Public Protector , the Auditor-General , the South African Human Rights Commission , the Commission for Gender Equality , the Public Service Commission and any other body prescribed under section 8, and, in respect of matters within their mandates, the Information Regulator , the National Consumer Commission , the Department of Employment and Labour , the Compensation Fund , the Companies and Intellectual Property Commission , SARS and the Financial Intelligence Centre ;
- any other person or body, under the general protected disclosure in section 9, where you reasonably believe you would be subjected to an occupational detriment if you disclosed internally, that evidence would be concealed or destroyed, that RVZ has failed to act on a previous disclosure, or that the impropriety is exceptionally serious, and the disclosure is reasonable in all the circumstances and not made for personal gain.

7.2 We encourage you to use an internal route first so that we can act quickly, but that is a request, not a condition of protection.

8. Mandatory reporting duties

8.1 Certain matters must by law be reported irrespective of this policy. In particular, under PRECCA section 34 any person in a position of authority who knows or ought reasonably to have known or suspected that another person has committed an offence of corruption, or theft, fraud, extortion, forgery or uttering involving R100000 or more, must report it to the Directorate for Priority Crime Investigation (the Hawks); failure to do so is an offence. RVZ's directors and managers comply with this duty and will not delay a statutory report pending an internal investigation.

8.2 RVZ also complies with the section 24 incident-reporting duties under the OHSA, the notification duties under POPIA section 22, the reportable-irregularity and prescribed-officer duties under the Companies Act, and the Financial Intelligence Centre Act reporting duties where applicable.

9. Good faith, false reports and interaction with other policies

9.1 An unsubstantiated report made in good faith is not misconduct and attracts full protection. A report is not protected where the discloser commits an offence by making it, or where it is made knowing the information to be false or with reckless disregard for the truth; a knowingly false and malicious allegation may be addressed fairly under the disciplinary procedure.

9.2 A discloser who was personally involved in the impropriety does not lose protection by reporting it, though the disclosure does not by itself exempt them from the consequences of their own conduct; cooperation and self-reporting are treated as substantially mitigating.

9.3 This policy operates together with our Grievance and Fair Procedure Policy, Occupational Health and Safety Policy, Privacy Policy and Confidentiality Policy. Where they conflict, the protection of a good-faith discloser prevails.

9.4 This policy is reviewed at least annually and after any legal change, incident, audit finding or material stakeholder complaint.

10. Legal references

- Protected Disclosures Act 26 of 2000 , as amended by Act 5 of 2017 — ss 1 (definitions of "disclosure", "employee", "worker", "impropriety", "occupational detriment"), 2(3) (void contractual terms), 3 (prohibition of occupational detriment), 3A (joint liability), 3B (employer's duty to inform), 4 (remedies), 5–9 (protected disclosures to legal adviser, employer, Cabinet member, prescribed bodies and general protected disclosures), 9A–9B (offences and immunity from civil and criminal liability).
- Labour Relations Act 66 of 1995 — ss 186(2)(d) (unfair labour practice: occupational detriment) and 187(1)(h) (automatically unfair dismissal); s 191 (referral to the CCMA and Labour Court).
- Prevention and Combating of Corrupt Activities Act 12 of 2004 — ss 3–21 (corruption offences), 34 (duty to report) and 34A (failure to prevent corrupt activities, as amended by the Judicial Matters Amendment Act 15 of 2023).
- Companies Act 71 of 2008 — ss 75–77 (directors' duties and personal financial interests), 159 (protection for whistle-blowers) and 214 (false statements and reckless conduct).
- Occupational Health and Safety Act 85 of 1993 — ss 14 (duties of employees), 24 (reporting of incidents) and 26 (victimisation forbidden).
- Protection of Personal Information Act 4 of 2013 — processing of a discloser's and implicated person's personal information under ss 9–22, and s 22 (notification of security compromises).
- Financial Intelligence Centre Act 38 of 2001 — s 29 (reporting of suspicious and unusual transactions).
- Promotion of Equality and Prevention of Unfair Discrimination Act 4 of 2000 and Employment Equity Act 55 of 1998 — unfair discrimination as a reportable impropriety.

This page is the public edition of RVZ's Whistleblowing and Protected Disclosures policy (POL-ETH-05) and reflects the legislation cited as at the date shown above. It is not legal advice. Anyone considering a disclosure may obtain independent legal advice, and a disclosure to a legal adviser is itself protected.

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