CART HORSE PROTECTION ASSOCIATION

WHISTLE BLOWING POLICY

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Whistle Blowing Policy

1. Objectives of the policy

1.1 The Association is committed to achieving the highest standard of ethical conduct and to ensuring that management, employees and others who may provide services on its behalf act in compliance with all applicable laws regulating the combating of bribery and corruption.

1.2 The Association does not tolerate any form of bribery or corruption. It is thus policy that all employees and representatives comply with the Prevention and Combating of Corrupt Activities Act 12 of 2004 and support the policy on the Protocol against corruption, created by the Southern African Development Community as signed by the Heads of State/Government and take cognizance of the Protected Disclosures Act 26 of 2000.

1.3 This policy applies to all office bearers, board members, employees, and temporary workers (such as consultants or contractors) across the group as well as all third-parties or representatives acting with or in cooperation to the Association, no matter where they are located or what they do.

2. Whistle blowing

2.1 The Association is committed to ensuring that employees can speak up with confidence if they have any concerns or need to ask for help.

2.2 If an employee suspects or observes anything that might be in contravention of this policy, they have an obligation to report it exists.

2.3 The Association will not tolerate retaliation in any form against anyone for raising concerns or reporting what they genuinely believe to be improper, unethical or inappropriate behaviour.

2.4 All reports will be treated confidentially and any person reporting such behaviour will be protected from being subjected to an occupational detriment. This policy shall take precedence over any clause or provision in any other agreement that the employee may be party to, and the employee's right to whistle blow and expect confidentiality is hereby assured.

2.5 Please also read the ANTI-CORRUPTION POLICY for more information.

3. Procedure for reporting

3.1 Any concerns about malpractice, fraud, theft, internal irregularities or corruption can be raised through the relevant channels i.e. our LabourNet consultant, the General

Manager or the Chairperson of the Management Committee.

3.2 Concerns should be raised as early as possible, giving any background and history, including relevant dates and witnesses.

3.3 Members in charge of receiving and dealing with whistle blowing alerts are subject to confidentiality undertakings.

3.4 An investigation will be carried out. The whistle-blower must not investigate him/herself; this could result in either the destruction or contamination of evidence or pose a safety risk.

3.5 Following the investigation, the whistle-blower will be informed of the outcome and what action will be taken, which may be to do nothing or to follow the full disciplinary procedure. However, the need for confidentiality may mean that the whistle-blower cannot be given much detail.

3.6 The whistle-blower should treat any information regarding the investigation as confidential.

3.7 If whistle-blower believes that the concern/s has/have not been dealt with properly or the wrongdoing is still going on, then this should be raised with the General Manager or Chairperson of the Management Committee.

4. Protection of the Whistleblower (as in the Anti-Corruption Policy)

4.1 CHPA respects the right of an individual to retain their anonymity when reporting malpractice, fraud, theft, internal irregularities or corruption.

4.2 Employees (as defined in the Protected Disclosures Act, No 26 of 2000 as amended), who report suspected malpractice, fraud, theft, internal irregularities or corruption furthermore have the protection of the provisions of this Act.

4.3 For the purposes of the Protected Disclosures Act the definition:

"Employee means:

- *Any person, excluding an independent contractor, who works for another person or for the State and who receives, or is entitled to receive, any remuneration; and*
- *Any other person who in any manner assists in carrying on or conducting the business of the employer,…"*

4.4 In essence, the Protected Disclosures Act protects an employee against dismissal or occupational prejudice where a disclosure has been made to his or her employer in good faith, and in accordance with a procedure prescribed by the employer that meets the requirements of this Act.

Please refer to the Fraud, Theft and Anti Corruption Policy for more information.