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003	31.10.2021	31.10.2022	CAMI EADES	SHARON EADES

Reporting of Suspicious Conduct Procedure Document

1. PURPOSE

- 1.1. The procedure provides a confidential and secure means for employees to report and raise concern about conduct which may be contrary to Cape Precious Metals (Pty) Ltd. (CPM) policies.

2. SCOPE

- 2.1. This document applies to all employees employed by CPM.

3. GENERAL REQUIREMENTS

- 3.1. Employees have a duty to report any conduct that is, or may be, contrary to CPM policies.
- 3.2. Employees may raise concern through various channels including:
 - 3.2.1. In writing to the Directors
 - 3.2.2. To HR Manager (verbally or in writing)
 - 3.2.3. Letter in letter box in front of the office of Sharon Eades
- 3.3. All whistleblowing disclosures made to the parties above will be treated as confidential
- 3.4. Senior Management will investigate allegations and take the necessary steps to protect the employees and the company.
- 3.5. The whistle blower will be kept informed of progress and the outcome of the investigation, within the constraints of maintaining confidentiality or observing legal restrictions generally.
- 3.6. Deliberate false reporting amounts to misconduct and any such reporting shall be subject to disciplinary action.

4. WHISTLE BLOWER PROTECTION

- 4.1. The protection of whistle blowers, including keeping the identity of the individual confidential, is fundamental.
- 4.2. CPM will not tolerate any form of retaliation against employees raising concern in good faith. Allegations of retaliation against, harassment or intimidation of an employee by others as a result of a report will be investigated and appropriate action taken, including disciplinary action.
- 4.3. The whistle blower will be protected from consequences unless the whistle blower is responsible for, or otherwise implicated in, any irregular conduct that is illegal or in breach of CPM policies.