	Business Integrity Management	Version: V1.0
	Whistleblowing policy	Date: 01 Dec 2020
		BI1-META-010-DOC4

## 1 PURPOSE AND SCOPE

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The aim of this Whistleblowing Policy is to encourage employees and others who have serious concerns about any aspect of META Group (META) operations to come forward and voice those concerns. In this Policy Whistleblowing means:

Whistleblowing – Reporting by an employee or contractor of suspected illegal acts, misconduct or failure to act upon similar issues within the organisation.

The Policy is designed to ensure that employees and contractors can raise their concerns about wrongdoing or malpractice within META without fear of victimisation, subsequent discrimination, disadvantage or dismissal. This Policy encourages those who become aware of wrongdoing within META affecting some other person or service, to report their concerns at the earliest opportunity so that they can be properly investigated.

For concerns relating the treatment of any employee, concerns should be raised following the Grievance Management Procedure.

This policy is applicable to META and its operational companies (OpCos) and the term “employee” is meant to include contractors and third parties as well.

## 2 PROCEDURE

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### 2.1 Possible concerns

Any serious concerns that an employee has about META operations or about the conduct of any META employee or others acting on behalf of META that:

- The employee considers inappropriate behavior;
- Are not in line with META policies and procedures; or
- Makes the employee feel uncomfortable in terms of norms and values

These might relate, but are not limited, to:

- A breach of the META Anti-Bribery Policy;
- A breach of the META Business Ethics Policy;
- A breach of the META Donations, Gifts and Hospitality Policy;
- A breach or potential breach of Occupational Health and Safety Policy;
- A breach of legislation;
- Financial irregularities;
- Harassment of a colleague, customer or other individual;
- Damage to the environment; or
- The committing of a criminal offence.

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## 2.2 Raising a concern

With this policy META enables those who know of or suspects wrongdoing within META affecting some other person or service, to report their concerns at the earliest opportunity so that they can be properly investigated. Concerns can be raised with:

- The line manager; or, if this is not possible because for example it is believed that the line manager is involved in the wrongdoing, with any of the following;
- The Maris Group Compliance Officer, [enrico.nora@marisafrica.com](mailto:enrico.nora@marisafrica.com);
- The Maris Group HR Manager, [karijn.debok@marisafrica.com](mailto:karijn.debok@marisafrica.com);
- In cases which involve the HR team or Senior Management concerns can be reported to [whistleblower@marisafrica.com](mailto:whistleblower@marisafrica.com); or,
- Alternatively, reports can be made confidentially through the Grievance Report Form on the META website [metagroupafrica.com](http://metagroupafrica.com).

## 2.3 Actions by META

Any manager or representative of META or one of its OpCos who is informed by an employee of a potential wrongdoing should advise their Compliance Officer. The Compliance Officer will take immediate action on behalf of META to investigate the situation. The employee will also be informed of the outcome of the investigation.

## 2.4 Alerting external bodies


If the employee has reported a concern within META but is not satisfied with the response, the employee may contact a relevant external body to express their concerns. In doing this the employee should:

- Have a reasonable belief that the allegation is based on correct facts. The employee understands that META will not be responsible for baseless or defamatory allegations;
- Not be making any personal gain from the allegation; and,
- Make the disclosure to a relevant and appropriate external body.

The media is not a relevant external body. Employees should not contact the media with allegations about META or its employees, including its OpCos and their employees.

### 2.4.1 Protection against detriment

META will take steps to protect an employee in relation to any allegations which are made by him or her. Employees should however follow the procedure set out in this policy, where the procedure is not followed, protection against detriment will not apply. Making allegations or disclosing information in an inappropriate way (e.g. contacting the media or spreading malicious allegations) could result in disciplinary action being taken against the employee.

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### 3 COMMUNICATION

The Whistleblowing Policy should be available and accessible to all META employees, including the employees of its Operational Companies, as well as contractors.

### 4 APPROVAL AND VERSION CONTROL

The META Group Compliance Officer will review this policy periodically and submit to the META Board of Directors an annual report on Business Integrity matters.

Approval:

	Date	Name	Position	Signature
<b>Created:</b>				
<b>Reviewed:</b>				
<b>Approved:</b>				

Revision History:

Revision no.	Revision Date	Name	Description