

	Whistle Blowing Policy	Document No:	HR 2-55
		Revision No:	2
		Revision Date:	2026-03-26
	Human Resources Policies	Page Number:	1 of 4
	Human Resources	SHEQ-ISO Clause:	7

Objective

The Company enables any person to safely report unethical, illegal, or unsafe activities within an organization without fear of retaliation. Its primary purpose is to promote transparency, accountability, and integrity, while protecting whistleblowers from victimization and ensuring allegations are investigated correctly.

Scope

This policy applies to all employees, employers, management, visitors, contractors, service providers, suppliers, customers and affiliates of the Bandini Group.

Policy

The South African Protected Disclosures Act, Act 26 of 2000 (PDA), as amended, aims to promote greater openness and transparency in the workplace and acknowledges the need to offer legal protection to whistleblowers. The South African Constitution and the Labour Relations Act support the content of the PDA.

The PDA protects whistleblowers against retribution such as dismissal or any prejudicial conduct if they disclose information to certain persons concerning, among other things, the commission of criminal offences, unfair discrimination, injustices, and conduct detrimental to health and safety or the environment.

In accordance with legislation, this policy also aims to support a culture where any person can disclose information or concerns relating to criminal and other irregular conduct in the workplace and other areas of influence. It establishes safe, confidential, and effective mechanisms for such disclosure.

This policy is not designed to create a platform for questioning any financial or business decisions that the Bandini Group makes.

Procedure

A concerned person, as defined by this policy, is an employee of the Bandini Group or any other person that has association with the Group and who reports any activity that they consider unlawful or unethical.

- An employee who wishes to make such disclosures should discreetly report to their direct supervisor to inform them of the incident or observations.
- In case the incident involves the whistleblower's supervisor the employee should approach the Human Resources Manager or Management.
- If any person wishes to make a disclosure, but feels that the company has a vested interest in ignoring the complaint, the person can:

	Whistle Blowing Policy	Document No:	HR 2-55
		Revision No:	2
		Revision Date:	2026-03-26
	Human Resources Policies	Page Number:	2 of 4
	Human Resources	SHEQ-ISO Clause:	7

- submit a disclosure online at www.mozzarella.co.za/whistle-blowing, which will be automatically sent to a third party
- send an email to JHB Law on whistleblow@jhblaw.co.za
- Any proof such as documents, media, photographs, messages, chats, mails, etc., should be provided in order to substantiate the complaint.
- Whistleblowers are not required to conduct their own investigations but merely lodge a complaint with the appropriate personnel. The Human Resources Manager together with Management will take the investigations forward as they deem fit.
- Protected disclosures should preferably be reported in writing so as to ensure a clear understanding of the issues raised and should either be typed or written in a legible handwriting in English.
- Protected disclosures should be factual and should contain as much specific information as possible. This allows for proper assessment of the nature and extent of the concern and the urgency of a preliminary investigative procedure.
- The whistleblower may or may not disclose their identity. Anonymous disclosures will also be entertained. However, it may not be possible to interview the whistleblower and grant them protection under the policy.

Disqualifications

- While it will be ensured that genuine whistleblowers are accorded complete protection from any kind of unfair treatment, any abuse of this protection will warrant disciplinary action.
- Protection under this policy would not mean protection from disciplinary action arising out of false or bogus allegations made by a whistleblower knowing it to be false or bogus or with a mala fide intention.
- Whistleblowers who make protected disclosures, on a regular basis, which have been subsequently found to be frivolous, baseless, malicious and having mala fide intention, will be disqualified from reporting further protected disclosures under this policy. In respect of such whistleblowers, the company would reserve its right to take appropriate disciplinary action.
- A service provider, client or contractor who intentionally files a false report of wrongdoing will be subject to having their service temporarily suspended pending an investigation.

Investigation

- All protected disclosures reported under this policy will be thoroughly investigated by the Company.
- The company may at its discretion, consider involving an external investigator for the purpose of investigation.

	Whistle Blowing Policy	Document No:	HR 2-55
		Revision No:	2
		Revision Date:	2026-03-26
	Human Resources Policies	Page Number:	3 of 4
	Human Resources	SHEQ-ISO Clause:	7

- The outcome of the investigation may not support or may not specifically align with the conclusion of the whistleblower.
- The identity of the alleged accused will be kept as confidential as possible, given the needs of the law.
- The alleged accused will normally be informed of the allegations, at the outset, and will have opportunities for providing inputs or defence during the investigation.
- The alleged accused shall have a duty to co-operate with the investigators.
- The alleged accused has a right to consult with a person or persons of their choice. They shall be free at any time to engage external counsel to represent them in the investigation proceedings at their own cost.
- The alleged accused has a responsibility not to interfere with the investigation. Evidence shall not be withheld, destroyed or tampered with, and witnesses shall not be influenced, coached, threatened or intimidated by them.
- Unless there are compelling reasons not to do so, the alleged accused will be given the opportunity to respond to material findings contained in an investigation report. No allegation of wrongdoing against the alleged accused shall be considered unless there is good evidence in support of the allegation.
- The alleged accused has a right to be informed of the outcome of the investigation. If allegations are not sustained, the alleged accused should revert back to his prior standing in the organisation.
- The investigation shall be completed as soon as possible, normally within 45 days of the receipt of the protected disclosure.

Protection

- No unfair treatment will be metered out to a whistleblower by virtue of them having reported a protected disclosure under this policy. The company, as a policy, condemns any kind of discrimination, harassment or victimisation or any other unfair employment practice being adopted against whistleblowers. The company will take steps to minimise difficulties which the whistleblower may experience as a result of making the protected disclosure. If the whistleblower is required to give evidence in criminal or disciplinary proceedings, the company will arrange for the whistleblower to receive advice about the procedure.
- The identity of the whistleblower shall be kept confidential to the extent possible and permitted under law. Whistleblowers are cautioned that their identity may become known for reasons outside the company control.
- Any other employee assisting in the said investigation shall also be protected to the same extent as the whistleblower.

	Whistle Blowing Policy	Document No:	HR 2-55
		Revision No:	2
		Revision Date:	2026-03-26
	Human Resources Policies	Page Number:	4 of 4
	Human Resources	SHEQ-ISO Clause:	7

Investigator's Role

The Bandini Group mandates that investigators are required to conduct a process towards fact-finding without hinderance. Technical and other resources may be drawn upon as necessary to augment the investigation. All investigators shall be independent and unbiased. Investigators have a duty of fairness, objectivity, thoroughness, ethical behaviour and observance of legal and professional standards. Investigations will be launched only after a preliminary review which establishes that:

- the alleged act constituted improper conduct or unethical activity
- the allegation is substantiated enough for an investigation to be conducted by management

Decision

If an investigation is led by an external investigator to conclude that an improper unethical act has been committed, they shall recommend to the management of the company to take such disciplinary or corrective action as they deem fit.

If the investigation was led by the company, any disciplinary or corrective action against the accused shall adhere to the applicable disciplinary procedures.

Policy Compliance

The Bandini Group views any non-compliance with this policy, as well as any non-compliance with its obligations in terms of legislation, in a serious light. Any deliberate action by an employee to contravene the policy will be subject to disciplinary action, which may lead to termination of employment.

Visitors, contractors, service providers, suppliers and customers who do not comply to this policy will be subjected to temporary suspension pending an investigation which may lead to termination of service.

U.S. BANDINI
Managing Director

M.R.E. BANDINI
Managing Director