

JSK Holdings (Pty) Ltd**Physical Address :**

2 Amber Rd Elandsfontein
Germiston
South Africa 1401

Tel: +27 (0) 10 023 2896

Fax: +27 (0)11 776 9235

Email : info@jskh.co.za



JSK HOLDINGS WHISTLEBLOWING POLICY

JSK Holdings (Pty) Ltd**Physical Address :**

2 Amber Rd Elandsfontein
Germiston
South Africa 1401

Tel: +27 (0) 10 023 2896

Fax: +27 (0)11 776 9235

Email : info@jskh.co.za

**Whistleblowing Policy (Confidential Reporting)****1. What is Whistleblowing?**

In this policy, Whistleblowing refers to situations that may arise whereby reports are made by employees or members of the public to JSK Holdings' senior management identifying employees that maybe suspected of misconduct, illegal acts or failure to act within the Company policies. The aim of this Policy is to encourage employees and others who have serious concerns about any aspect of the Company's work to come forward and voice those concerns. JSK Holdings views 'Whistleblowing' as a positive act that can make a valuable contribution to the Company's efficiency and long-term success. Employees are therefore encouraged to speak up where they see certain situations that may align with misconduct and must note that it does not make them disloyal to colleagues or the Company when they speak up, but their actions to come forward may just save the business and its image in the short and long term. At JSK Holdings, we are committed to achieving the highest possible standards of service and the highest possible ethical standards both in public life and in all its operations. Freedom of speech is encouraged and where the right is exercised, professionalism and respect must remain the anchor of our practices. If you are considering raising a concern you should read this Policy first. It explains:

- the type of issues that can be raised
- protection of whistleblowers from victimization and harassment
- procedure for raising concerns and
- the action that JSK Holdings will take ©JSKH, 2025

2. What is the aim of the Policy and when does it apply?***2.1 Aims of the Policy:***

JSK Holdings (Pty) Ltd

Physical Address :

2 Amber Rd Elandsfontein
Germiston
South Africa 1401

Tel: +27 (0) 10 023 2896

Fax: +27 (0)11 776 9235

Email : info@jskh.co.za



The Policy aims to ensure that whistleblowers can raise their concerns about wrongdoing or malpractice within the Company without fear of victimisation, subsequent discrimination, disadvantage or dismissal. It is also intended to encourage and enable the whistleblower to raise serious concerns within the Company rather than ignoring a problem or 'blowing the whistle' outside the organisation. This Policy thus aims to:

- encourage whistleblowers to feel confident in raising serious concerns at the earliest opportunity possible and to question and act upon concerns about malpractice without fear.
- provide the avenues for whistleblowers to raise those concerns and receive feedback on any action taken while feeling safe and protected by the organisation.
- ensure that timeous feedback is received and that where the responses are not satisfactory, the whistleblowers are provided with alternative channels which they can follow to pursue the concerns until the matter in hand has been dealt with to the satisfaction of the whistleblowers.
- give assurance that the whistleblowers are protected from possible reprisals or victimisation where the whistleblowers have made any disclosure in good faith. Any acts of victimization and intimidation must be reported, and the policy provides redress for such issues when they are identified or reported.

2.2 Scope of this Policy:

This Policy is intended to enable those who become aware of wrongdoing in the Company affecting some other person or service, to report their concerns at the earliest opportunity so that they can be properly investigated. The Whistle Blowing Policy is not intended to replace existing procedures:

© JSK Holdings, 2025

- All concerns related to issues of employee treatment should be raised under the existing grievance or harassment procedures
- All customer/supplier complaints about services provided shall be raised as complaints and will be dealt with as complaints to the Company

JSK Holdings (Pty) Ltd

Physical Address :

2 Amber Rd Elandsfontein
Germiston
South Africa 1401

Tel: +27 (0) 10 023 2896

Fax: +27 (0)11 776 9235

Email : info@jskh.co.za



- All complaints of misconduct by directors or senior executives are dealt with under a separate procedure (for further information please contact the Company's Chief Executive Officer).

2.3 Who can raise a concern under this Policy:

The Policy applies to all:

- employees of JSK Holdings
- employees of contractors working for JSK Holdings, for example, consultants, construction teams, hired logistics companies etc.
- employees of suppliers
- those providing services under a contract or other agreement with JSK Holdings in their own premises
- Customers representatives purchasing goods and services from JSK Holdings

2.4 What should be reported:

Any serious concerns that you have about service provision or the conduct of officers or members of the Company or others acting on behalf of the Company that:

- make you feel uncomfortable in terms of known standards for example getting a cut out of a purchase or a sale amongst others;
- are not in keeping with the JSK Holdings's Constitution and policies;
- fall below established standards of practice; or
- are improper behaviour. These might relate to: © JSK Holdings, 2025
- conduct which is an offence or a breach of the law (a criminal offence has been committed or failing to comply with any other legal obligation) example theft

JSK Holdings (Pty) Ltd

Physical Address :

2 Amber Rd Elandsfontein
Germiston
South Africa 1401

Tel: +27 (0) 10 023 2896

Fax: +27 (0)11 776 9235

Email : info@jskh.co.za



- disclosures related to miscarriages of justice for legal and protected information
- racial, sexual, disability or other discrimination by any member of the staff
- health and safety of the public and/or other employees that may be seriously compromised due to negligence of certain employees
- damage to the environment where identified activities affect the environment but JSK Holdings or some of their employees refuse to put adequate control measures to mitigate the problems and reduce environmental impacts.
- unauthorised use of funds or other assets
- possible fraud and corruption including all issues related to inventory management and cash management among others
- neglect or abuse of clients, or
- other unethical conduct. This list is not exhaustive.

3. Protecting the Whistleblower.

3.1 Your legal rights:

This policy has been written to take account of section 159 of the South African Companies Act 21 of 2008 which protects workers making disclosures about certain matters of concern, when those disclosures

are made in accordance with the Act's provisions and in the public interest, from any civil, criminal, or administrative liability.

The Act makes it unlawful for the Company to dismiss anyone or allow them to be victimised on the basis that they have made an appropriate lawful disclosure in accordance with the Act.

JSK Holdings (Pty) Ltd

Physical Address :

2 Amber Rd Elandsfontein
Germiston
South Africa 1401

Tel: +27 (0) 10 023 2896

Fax: +27 (0)11 776 9235

Email : info@jskh.co.za



Some cases may arise where the whistleblowers themselves where in one way or another involved in the misconduct they are reporting, and they are now blowing the lid on other members still involved in the misconduct. In such a case it is in the employee's interest to come into the open as soon as possible as the extent of their involvement has to be ascertained. The Company cannot promise not to act against such an employee in such cases, but the fact that they came forward may be taken into account where legal proceedings or any actions matching the level of misconduct have to be taken. © JSK Holdings, 2025

3.2 Harassment or Victimisation:

JSK Holdings is committed to good practice and high standards and to being supportive of all its employees including the whistleblowers. JSK Holdings therefore recognises that the decision to report a concern can be a difficult one to make. Employees are encouraged that where they honestly and reasonably believe a misconduct has taken place, they should have nothing to fear because by reporting the misconduct, they will be doing their duty to the employer, the colleagues and to those for whom services are being provided. JSK Holdings will not tolerate any harassment or victimisation of whistle blowers (including informal pressures) and will take appropriate action to protect any whistleblower who raise concerns in good faith and will treat any evidence of harassment or victimization as serious disciplinary offences which will be dealt with under the disciplinary rules and procedure.

4. Support to you Throughout this process

- The whistle blower will be given full support from senior management
- Any concerns that the whistleblower raises will be taken seriously, and
- JSK Holdings will do all it can to help you throughout the investigation.
- Where appropriate, the Company will consider temporarily re-deploying the whistle blower for the period of the investigation
- For those who are not Company employees, the Company will endeavour to provide

JSK Holdings (Pty) Ltd

Physical Address :

2 Amber Rd Elandsfontein
Germiston
South Africa 1401

Tel: +27 (0) 10 023 2896

Fax: +27 (0)11 776 9235

Email : info@jskh.co.za



appropriate advice and support wherever possible.

4.1 Confidentiality:

All concerns will be treated as confidential, and every effort will be made not to reveal the whistleblower identity if that is the wish of the whistleblower. If disciplinary or other © JSK Holdings, 2025 proceedings follow the investigation, it may not be possible to take action because of the whistleblower's disclosure without his/her help, so the whistleblower may be asked to come forward as a witness. JSK Holdings will be offered advice and support if they agree to come forward as a witness.

4.2 Anonymous Allegations:

This Policy encourages the whistleblower to put their name to the allegation report whenever possible. If no name is given in the report and it remains with an anonymous reporter, it will be much more difficult for JSK Holdings to protect the employee's position or to give them feedback. This policy is not ideally suited to concerns raised anonymously. Concerns expressed anonymously are much less powerful, but the details reported shall always be considered and investigated thoroughly for the benefit of the organisation. In exercising this discretion, the factors to be taken into account would include:

- the seriousness of the issue raised
- the credibility of the concern, and
- the likelihood of confirming the allegation from other sources.

4.3 Untrue Allegations:

If a whistleblower makes an allegation in good faith and reasonably believes it to be true, but it is not confirmed by the investigation, JSK Holdings will recognise the concern and the whistleblower has nothing to fear. If, however, the whistleblower makes an allegation frivolously, maliciously or for personal gain, JSK Holdings after finding this out will take appropriate action that could include disciplinary action or other actions befitting the level of the misconduct.

5. Raising a Concern

JSK Holdings (Pty) Ltd

Physical Address :

2 Amber Rd Elandsfontein
Germiston
South Africa 1401

Tel: +27 (0) 10 023 2896

Fax: +27 (0)11 776 9235

Email : info@jskh.co.za



5.1 Who should you raise your concern with:

This will depend on the seriousness and sensitivity of the issues involved and the level of the person who is suspected of the wrongdoing. All whistleblowers should normally raise concerns with: © JSK Holdings, 2025

- Your Line Manager
- The Chief Operating Officer via email barnabas@jskh.co.za
- The Accountant via accounts@jskh.co.za or by telephone on 010 023 2896
- The Chief Executive on 010 023 2896. The address for correspondence is JSK Holdings, 2 Amber Road, Elandsfontein, Germiston South Africa.

5.2 How to raise a concern:

A whistle blower may raise their concerns by telephone, in person or in writing. The earlier the concern is expressed, the easier it is to take action. The whistle blower will need to provide the following information:

- the nature of your concern and why the whistleblower believes it to be true;
- the background and history of the concern (giving relevant dates) Although the whistleblower is not expected to prove beyond doubt the truth of the suspicion, the whistleblower will need to demonstrate to the person contacted that they have a genuine concern relating to suspected wrongdoing or malpractice within the Company and that there are reasonable grounds for concern and investigation.

© JSK Holdings, 2025 The whistleblower may wish to consider discussing the concern with a colleague first and may find it easier to raise the matter if there are two (or more) people who have had the same experience or concerns. The whistleblower may invite a trade union, professional association representative or a friend to be present for support during any meetings or interviews in connection with the concerns they have raised.

JSK Holdings (Pty) Ltd

Physical Address :

2 Amber Rd Elandsfontein
Germiston
South Africa 1401

Tel: +27 (0) 10 023 2896

Fax: +27 (0)11 776 9235

Email : info@jskh.co.za



6. What JSK Holdings will do:

JSK Holdings will respond to the whistleblower concerns as quickly as possible. The whistleblower must not forget that testing the concerns is not the same as either accepting or rejecting them. The overriding principle for JSK Holdings will be the public interest. In order to be fair to all employees, including those who may be wrongly or mistakenly accused, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. The investigation may need to be carried out under terms of strict confidentiality, i.e., by not informing the subject of the complaint until (or if) it becomes necessary to do so.

In certain cases, however, such as allegations of ill treatment of others, suspension from work may have to be considered immediately. Protection of others is paramount in all cases.

Where appropriate, the matters raised may:

- be investigated by management, internal audit, or through the disciplinary/grievance process
- be referred to the police
- be referred to the external auditor
- be referred and put through established child protection/abuse procedures © JSK Holdings, 2025
- form the subject of an independent inquiry Within ten working days of a concern being raised, the person investigating your concern will write to you:
 - acknowledging that the concern has been received
 - indicating how JSK Holdings proposes to deal with the matter
 - supplying you with information on staff support mechanisms
 - telling you whether further investigations will take place and if not, why not.

JSK Holdings (Pty) Ltd

Physical Address :

2 Amber Rd Elandsfontein
Germiston
South Africa 1401

Tel: +27 (0) 10 023 2896

Fax: +27 (0)11 776 9235

Email : info@jskh.co.za



The amount of contact between the whistleblower and the officers considering the issues will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the whistleblower's information. It is likely that the whistleblower will be interviewed to ensure that their disclosure is fully understood. Any meeting can be arranged away from your workplace, if the whistleblower wishes, and a union or professional association representative or a friend may accompany them in support. The Company will do what it can to minimise any difficulties that the whistleblower may experience as a result of raising a concern. For instance, if the whistleblower is asked to give evidence in criminal or disciplinary proceedings, JSK Holdings will arrange for them to receive appropriate legal advice and support. The whistleblower needs to be assured that their disclosure has been properly addressed. Unless there are any legal reasons why this cannot be done, the whistleblower will be kept informed of the progress and outcome of any investigation.

7. The Responsible Officer:

The Chief Operations Officer has overall responsibility for the maintenance and operation of this Policy.

© JSK Holdings, 2025

8. How the Matter can be Taken Further:

This Policy is intended to provide the whistleblower with an avenue within the Company to raise concerns. The Company hopes you as a whistleblower will be satisfied with any action taken. If you are not, and you feel it is right to take the matter outside the Company, the following are the Company's prescribed contacts:

- the External Auditor:
- your trade union
- the police
- other relevant bodies prescribed by legislation – the Chief Operations Officer will be able to advise you who you can contact If you raise concerns outside the Company, you should ensure that it is to

JSK Holdings (Pty) Ltd**Physical Address :**

2 Amber Rd Elandsfontein
Germiston
South Africa 1401

Tel: +27 (0) 10 023 2896

Fax: +27 (0)11 776 9235

Email : info@jskh.co.za



one of these prescribed contacts. A public disclosure to anyone else could take you outside the protection of the Public Interest Disclosure Act and of this Policy. You should not disclose information that is confidential to the Company or to anyone else, such as a client, supplier or contractor of the Company, except to those included in the list of prescribed contacts. This Policy does not prevent you from taking your own legal advice.

9. Review of the Policy:

The Company's Policy Committee will review this Policy annually. © JSK Holdings, 2025

10. Corporate Recording and Monitoring:

The Chief Operations Officer will maintain a corporate register containing all concerns that are brought to their attention. All officers allocated to look into a concern must ensure the Chief Operations Officer is provided with sufficient details for the corporate register. The Chief Operations Officer will review the corporate register and produce an annual report for the Board of Directors. The report will include a summary of the concerns raised, to which department they related, the post to which the concerns related (if not confidential) and any lessons learned. The report will not include any employee names. The aim of this is to ensure that:

- the Company and/or the relevant department learns from mistakes and does not repeat them, and
- consistency of approach across the departments.

The corporate register together with the annual reports will be available for inspection by internal and external audit, after removing any confidential details.