

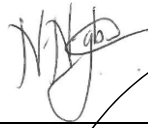

	TITLE OF POLICY:	WHISTLEBLOWING POLICY
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	COMPILED	MANAGER: LEGAL, RISK AND COMPLIANCE
	SIGNED BY M: LRC	
	REVIEWED	CHIEF FINANCIAL OFFICER
	SIGNED BY CFO	
	RECOMMENDED	CHIEF EXECUTIVE OFFICER
	SIGNED BY CEO:	
	APPROVED	BOARD CHAIRPERSON
	SIGNED BY	
	EFFECTIVE DATE:	DATE OF APPROVAL

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1. DEFINITIONS, ACRONYMS AND ABBREVIATIONS

Term	Description
Criminal offence	Refers to action which is considered unlawful in terms of the statutory or common law and is punishable by law in a criminal court and includes, but it is not limited to, fraud, corruption, bribery, theft, forgery, uttering and extortion.
Disclosure	<p>Any disclosure of information regarding any conduct of an employer, or of an employee or of a worker of that employer, made by any employee or worker who has reason to believe that the information concerned shows or tends to show one or more of the following:</p> <p>(a) that a criminal offence has been committed, is being committed or is likely to be committed;</p> <p>(b) that a person has failed, is failing or is likely to fail to comply with any legal obligation to which that person is subject;</p> <p>(c) that a miscarriage of justice has occurred, is occurring or is likely to occur;</p> <p>(d) that the health or safety of an individual has been, is being or is likely to be endangered;</p> <p>(e) that the environment has been, is being or is likely to be damaged;</p> <p>(f) unfair discrimination as contemplated in Chapter II of the Employment Equity Act, 1998 (Act No. 55 of 1998), or the Promotion of Equality and Prevention of Unfair Discrimination Act, 2000 (Act No. 4 of 2000); or</p> <p>(g) that any matter referred to in paragraphs (a) to (f) has been, is being or is likely to be deliberately concealed.</p>
Employee	<p>Refers to:</p> <p>(a) any person, excluding an independent contractor, who works for FBS and who receives, or is entitled to receive, any remuneration; and</p> <p>(b) any other person who in any manner assists in carrying on or conducting the business of FBS's and subsequently receives remuneration from FBS.</p> <p>The term is further extended to Temporary Employment Service (TES) which refers to an employee who has been assigned to FBS for a period of less than three months; employee assigned to FBS as a substitute for an employee who is temporarily absent from work; and employee assigned to FBS to perform a</p>

Term	Description
	category of work which is determined to be a temporary service by a collective agreement concluded in a bargaining council, a sectoral determination or a notice published in the Government Gazette by the Minister of Labour.
Employer	Refers to Food and Beverages Manufacturing SETA (hereinafter referred to as “FoodBev SETA” or “FBS”)
Grant beneficiary	Refers to a person or stakeholder who is a recipient of FBS grant whether directly or indirectly.
Impropriety	Refers to any conduct which falls within the categories referred to in (a) to (g) of the definition of “disclosure”, irrespective of whether or not the impropriety occurs or occurred in the Republic of South Africa or elsewhere; or the law applying to the impropriety is that of the Republic of South Africa or of another country.
Misconduct	Refers to a criminal offence; or failure to comply with any legal obligation; or a miscarriage of justice; or an act endangering the health and safety of an individual; or an act causing damage to the environment; or unfair discrimination; or the concealment of any of the abovementioned activities; and/or any act of misconduct as contemplated in the PFMA.
Occupational detriment	<p>In relation to the working environment of an employee means:</p> <ul style="list-style-type: none"> (a) being subjected to any disciplinary action; (b) being dismissed, suspended, demoted, harassed or intimidated; (c) being transferred against his or her will; (d) being refused transfer or promotion; (e) being subjected to a term or condition of employment or retirement which is altered or kept altered to his or her disadvantage; (f) being refused a reference, or being provided with an adverse reference, from his or her employer; (g) being denied appointment to any employment, profession or office; (h) being subjected to any civil claim for the alleged breach of a duty of confidentiality or a confidentiality agreement arising out of the disclosure of— <ul style="list-style-type: none"> (i) a criminal offence; or

Term	Description
	<p>(ii) information which shows or tends to show that a substantial contravention of, or failure to comply with the law has occurred, is occurring or is likely to occur;</p> <p>(i) being threatened with any of the actions referred to in paragraphs (a) to [(g)] (h) above; or</p> <p>(j) being otherwise adversely affected in respect of his or her employment, profession or office, including employment opportunities, and work security and the retention or acquisition of contracts to perform work or render services.</p>
Protected Disclosure	<p>Any disclosure made in good faith to:</p> <p>a) To FoodBev SETA in accordance with this procedures prescribed in this Policy;</p> <p>b) the Public Protector;</p> <p>c) the South African Human Rights Commission;</p> <p>d) the Commission for Gender Equality;</p> <p>e) the Commission for the Promotion and Protection of the Rights of Cultural, Religious and Linguistic Communities;</p> <p>f) the Public Service Commission; or</p> <p>g) the Auditor-General</p>
Stakeholders	<p>Refers to any person other than an employee of FoodBev SETA who the SETA engages with, this includes but not limited to learners, levy paying and non-levy paying employers, TVET Colleges, NGOs, Associations in the sector, training providers, SDF, DHET, National Treasury, National Skills Fund, and service providers.</p>
Whistle-blower	<p>Any person who engages in whistleblowing.</p>
Whistleblowing	<p>The disclosure by any person of any illegal, immoral or illegitimate practices under the control of FoodBev SETA to a person or organisation that might be able to effect action, or a disclosure made to the service provider appointed by FoodBev SETA to host the hotline services.</p>

2. LEGISLATIVE FRAMEWORK AND BEST PRACTICE REGULATIONS

2.1 This policy should be read in conjunction with the following prescripts, amongst others:

- a) The Protected Disclosure Act, Act 26 of 2000 (PDA);
- b) Public Disclosures Act No. 26 of 2002;
- c) Prevention and Combating of Corrupt Activities Act No. 12 of 2004;
- d) Skills Development Act No.26 of 2011 (as amended) (“SDA”)
- e) Public Finance Management Act, 1999 (as amended) (“PFMA”);
- f) National Treasury Regulations of March 2005;
- g) National Treasury Public Sector Risk Framework, April 2010;
- h) The King Code of Governance Principles (King IV);
- i) Public Sector Integrity Management Framework;
- j) FoodBev SETA Constitution (updated March 2018);
- k) FoodBev SETA Fraud and Corruption Prevention policy;
- l) FoodBev SETA Ethics and Anti-Fraud policy.

3. INTRODUCTION

3.1 FoodBev SETA is committed to conducting business with honesty and integrity and FoodBev SETA expects all staff to maintain the level of high standards in accordance with the organisations policies and procedures.

3.2 However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct by some of its partners and/or employees.

3.3 FoodBev SETA encourages a culture of openness and accountability in order to prevent such situations occurring and to address them immediately when they occur.

4. PURPOSE

4.1 The purpose of this policy is to:

4.1.1 Provide a means by which employees and stakeholders are able to raise concerns with the appropriate line management, or specific appointed person in the organization, where they have reasonable grounds for believing that there is fraud or corruption, or any other impropriety in the organisation.

4.1.2 Encourage employees and stakeholders to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated appropriately without compromising their confidentiality.

4.1.3 To provide employees and stakeholders with guidance as to how to raise concerns or make a disclosure.

4.1.4 To reassure employees and stakeholders that they should be able to raise genuine concerns without fear of reprisals or an occupational detriment.

5. SCOPE

5.1 The policy applies to everyone who carries out business with FoodBev SETA, including but not limited to:

- 5.1.1 All employees
- 5.1.2 Contractors and sub-contractors
- 5.1.3 Consultants
- 5.1.4 Employers/Companies
- 5.1.5 Learners
- 5.1.6 Interns
- 5.1.7 Fixed term contracts and temporary workers
- 5.1.8 Partners
- 5.1.9 Stakeholders as defined in this policy
- 5.1.10 Board members

5.2 This policy does not apply to personal grievances, these are dealt with under the Disciplinary Code and Grievance Procedure.

5.3 This policy covers all genuine concerns raised including:

- 5.3.1 Financial misconduct
- 5.3.2 Health and safety risks
- 5.3.3 Environmental damage
- 5.3.4 Unfair discrimination
- 5.3.5 Fraud, corruption, bribery and other misconduct
- 5.3.6 Failure to comply with statutory obligations/ requirements
- 5.3.7 Attempts to suppress or conceal any information relating to the above.

6. POLICY PRINCIPLES

6.1 What is Whistleblowing

6.1.1 Understood correctly, whistleblowing is not about informing in the negative, but rather about *“raising a concern about malpractice within the organization”*.

6.1.2 It is a key tool for promoting individual responsibility and organizational accountability.

6.1.3 It is the disclosure of information which relates to suspected wrongdoing. This may include, fraud and corruption, gross misconduct, breach of FoodBev SETA’s code of conduct etc.

6.1.4 Whistleblowers act in good faith and in the public interest to raise concerns around suspected impropriety within the workplace.

6.1.5 Any employee or stakeholder who has a genuine concern related to the above should report the suspected transgression under this policy.

6.2 Protected disclosure

- 6.2.1 A protected disclosure is any disclosure of information which, in the reasonable belief of the individual making the disclosure, tends to show that one or more of the following has been committed, or is being committed, or is likely to be committed:
- i. A criminal offence;
 - ii. A failure to comply with any legal obligation;
 - iii. Damage to the environment;
 - iv. Deliberate concealment of information relating to the above.
- 6.2.2 The Protected Disclosures Act (hereinafter referred to as the “PDA”), provides protection to employees for disclosures made without malice and in good faith.
- 6.2.3 According to the PDA, employees can blow the whistle on fraud and corruption, or any other impropriety in the workplace without fear of suffering an occupational detriment as defined by the Act.
- 6.2.4 Any employee of FoodBev SETA who makes a disclosure (blows the whistle) in terms of this policy and the PDA will be protected against occupational detriments, provided it is not a false, malicious or frivolous disclosure.
- 6.2.5 Potential whistle-blowers should, however, be aware that frivolous and vexatious, and especially malicious and false, allegations against another employee may lead to disciplinary or legal action against the person who made the disclosure.
- 6.2.6 Consequently, a whistle-blower must have a reasonable suspicion that an act of misconduct or impropriety has or is being committed. However, it is not expected of a potential whistle-blower to conduct his / her own investigation(s). That could in fact jeopardize any later investigation(s) and could also be dangerous. A whistle-blower should discuss any concerns or doubts with the person to whom they are making the disclosure.

6.3 Confidentiality

- 6.3.1 All the information received and investigated relating to alleged fraud and corruption and/or another impropriety will be treated confidentially. The progression of the investigation will be handled in a confidential manner and will not be disclosed or discussed with any person(s) other than those who have a legitimate right to such information. This is important in order to protect the rights of all person(s) until the conclusion of the investigation. This is important in order to avoid harming the reputation of the suspected person who may subsequently be found innocent of wrongdoing.

6.4 Fairness

- 6.4.1 All suspected persons shall be treated with fairness in accordance with the Code of Conduct and FoodBev SETA’s Disciplinary Code and Grievance Procedure.

6.4.2 FoodBev SETA commits to fairness, support and employee protection in response to reports of wrongdoing.

6.5 Transparency

6.5.1 Disclosures of impropriety shall, without undue delay, be considered and where appropriate, investigated and corrective action taken. FoodBev SETA shall ensure that employees, and other stakeholders receive a response regarding their concerns.

6.5.2 FoodBev SETA provides a variety of resources for employees, stakeholders and service providers to raise questions, concerns or reporting of actual, or suspected impropriety. FoodBev SETA has a toll-free line and a dedicated email address which is available to employees, stakeholders and service providers 24 hours a day, seven days a week and is equipped to all South African languages. The toll-free line is run by an organisation that is independent to FoodBev SETA and to the extent possible, callers may remain anonymous. In all cases, the whistleblower's privacy will be respected to the fullest extent possible under the law. The call centre will relay the information to FBS and will provide the employee or stakeholder with a reference number.

6.6 Who can make a disclosure?

6.6.1 Any employee or stakeholder who has a reasonable belief that there is fraud, corruption, misconduct or other impropriety relating to any of the protected matters specified in this policy can make a disclosure.

6.6.2 Whistleblowers are encouraged to make appropriate disclosures where there are reasonable grounds for believing that an impropriety has or is likely to take place. Concerns must be raised without malice, be made in good faith and not for personal gain. Whistle-blowers must reasonably believe that the information disclosed, and any allegations contained in it, are substantially true.

6.7 Protection and support for whistle-blowers

6.7.1 Management is committed to this policy. FoodBev SETA will ensure that any employee who makes a disclosure will not be penalised or suffer any occupational detriment for doing so.

6.7.2 If an employee makes a disclosure in good faith in terms of this policy, the employee will not be at risk of losing his/her job.

6.7.3 However, any employee who does not act in good faith or who makes a disclosure that is perpetuated by malice or made for the purposes of personal gain shall constitute misconduct and will be subjected to disciplinary action.

- 6.7.4 Therefore, in view of the protection offered to an employee raising a *bona fide* disclosure/concern, it is preferable that the employee writes their details to the disclosure.
- 6.7.5 However, FoodBev SETA recognises that an employee may nonetheless wish to make an anonymous disclosure under this policy. If an employee requests FoodBev SETA to protect his/her identity, FoodBev SETA will oblige and shall not disclose the employee's identity without the employee's consent. The employee will then have to also keep the same confidentiality on the matter.
- 6.7.6 In the event where FoodBev SETA is unable to resolve the concern without revealing the employee's identity (e.g. where evidence is needed in a disciplinary hearing or in court), FoodBev SETA will discuss with the employee on how to proceed.

7. PROCEDURE FOR REPORTING ALLEGED IMPROPRIETY

- 7.1 A former FoodBev SETA employee, a grant beneficiary, supplier, or any other stakeholder who has a concern or suspicion about any act of misconduct or impropriety, must report it immediately to the CEO or Chairperson of the Board. Alternatively, the matter can be reported anonymously to:
- i. the FoodBev SETA dedicated Hotline number 0800 222 336 or foodbev@tip-offs.com
 - ii. the Public Service Commission on the National Anti-Corruption toll free Hotline number 0800 701 701;
 - iii. the Auditor General or
 - iv. the Public Protector.
- 7.2 Depending on the nature of the concern, employees are encouraged to raise any concern or disclosure directly to the person responsible, thereby providing the person with an opportunity to clarify the issue. If, however, an employee does not feel comfortable talking to the person responsible, the employee may report the matter to the FoodBev SETA dedicated Hotline.
- 7.3 Apart from the dedicated Hotline service, other internal avenues for reporting of actual, or suspected impropriety includes reports made to the employee's line manager, the Senior Manager: Corporate Services and to the CEO.
- 7.4 An employee who is unable to raise his/her concern or suspicion internally as contemplated above e.g. because the line manager is involved in the alleged act of misconduct/ impropriety, or does not take any action when the matter is reported, may report the matter to the Auditor General, Public Service Commission and the Public Protector.

8. HOW WILL THE REPORTED MATTER BE HANDLED?

- 8.1 When an employee raises the concern, FoodBev SETA will look into it in order to assess, initially, what action should be taken. This may involve an internal enquiry or a formal investigation.
- 8.2 An independent investigator, appointed by the Board or delegate, will have the mandate to investigate all allegations of fraud, corruption, maladministration, and other impropriety as defined in this policy.
- 8.3 Where there are findings of a criminal nature, the investigator, after consultation with the CEO, will refer the matter to the appropriate law enforcement agencies i.e. SAPS or NPA for purposes of further investigation and prosecution.
- 8.4 The investigator will always strive, in his/her investigation, to work in conjunction with the Manager: Legal, Risk and Compliance and Internal Audit respectively for *inter alia* guidance and legal opinion in relation to the investigation, including the civil recovery of losses (where applicable) that the SETA might have suffered as a result of fraudulent, corrupt or other criminal activity.
- 8.5 If an investigation outcome includes the recommendation to suspend and/or institute disciplinary action, the recommendations will be communicated to Human Resources promptly in order for the recommendations of the disciplinary action to be implemented expeditiously and in line with the Disciplinary Code and Grievance Procedure.
- 8.6 If the decision is made not to investigate the matter, the reasons will be provided.
- 8.7 Should an employee have a personal interest in the matter, FoodBev SETA will ask that the employee to disclose this fact at the outset.
- 8.8 Should the matter fall under the grievance procedure, then FoodBev SETA will inform the employee and the employee will have to report the matter under the grievance procedures.
- 8.9 It is important for employees to note that, in certain circumstances, FoodBev SETA might not be in a position to communicate to the employee the precise action that it will take, where this could infringe a duty of confidence owed by the SETA to another employee or stakeholder.

9. GENERAL GUIDELINES

- 9.1 When reporting any act of misconduct or impropriety, the Whistle-blower must provide as much information and details as possible, including *who, what, when, where, why* and *how*.
- 9.2 Where possible, provide the following:
 - i. Name(s) of the perpetrator(s) and rank;
 - ii. Was the perpetrator alone?
 - iii. Who else is implicated?

- 9.2.1 The nature of the act of misconduct or impropriety, e.g. fraud, corruption and describe the items and the amounts
- 9.2.2 When did it happen (i.e. provide dates, time and frequency);
- 9.2.3 Where did it happen?
- 9.2.4 Where possible, mention the name of the province, business unit, street address and the name of the building.
- 9.2.5 How did it happen? Where possible, give proof/evidence i.e. file number, amounts involved, etc.
- 9.2.6 Demonstrate how the case can be investigated and if the Whistle-blower does not want to remain anonymous, he/she must indicate how they can be contacted for further information.

10. REPORTING AND MONITORING

- 10.1 FoodBev SETA recognises that Whistleblowers could be victimized by fellow employees or managers in contravention of the Protected Disclosures Act. This could have severe and negative implications for the SETA such as negative media publicity which may lead to reputational damage. As such, FoodBev SETA is committed and will treat all reported incidences with the greatest confidentiality to protect Whistle-blowers.
- 10.2 FoodBev SETA encourages its employees and stakeholders to utilize its dedicated Hotline to report allegations of fraud, corruption and other impropriety. This reporting is intended to achieve the following:
 - 10.2.1 To deter potential fraudsters and corrupt individuals by making all employees and stakeholders aware that FBS is not a soft target, as well as encouraging the participation of employees in supporting, and making use of FoodBev SETAs dedicated Hotline.
 - 10.2.2 To raise the level of awareness that FoodBev SETA is serious about fraud and corruption prevention and detection.
 - 10.2.3 To assist FoodBev SETA in managing the requirements of the Protected Disclosures Act by creating a channel through which whistle blowers can report irregularities that they have witnessed or that come to their attention.
 - 10.2.4 To further assist FBS in identifying areas of fraud and corruption risk in order that preventive and detective controls can be appropriately developed or improved.
- 10.3 Reasonable care should be taken in dealing with cases of suspected fraud and/or corruption to:

- 10.3.1 Avoid taking action based on unfounded allegations.
- 10.3.2 Avoid premature notice to persons suspected of fraud or corruption.
- 10.3.3 Ensure that information of suspected fraud or corruption is not disclosed to other people not involved in the investigation.
- 10.3.4 Ensure that the rights of the suspect are not violated.
- 10.4 The office of the CEO will ensure that a fraud and corruption register is developed for the following purposes:
 - 10.4.1 Recording all allegations.
 - 10.4.2 Tracking progress with the management of allegations.
 - 10.4.3 Provide feedback to relevant employees and other whistleblowers on the management of allegations.
- 10.5 As part of the register, FoodBev SETA will include the following minimum information when required:
 - 10.5.1 Number of allegations of corruption received and corruption cases detected per defined categories as defined in the Prevention and Combating of Corrupt Activities Act, 2004
 - 10.5.2 Number of allegations and cases referred to in 10.5.1 above:
 - (i) Handled in terms of disciplinary procedure;
 - (ii) Referred to law enforcement agency or other body;
 - (iii) Not investigated for disciplinary purposes or not referred; and
 - (iv) Description of corruption risk areas.
 - 10.5.3 Report on the performance of its minimum anti-corruption capacity as part of its annual report.
- 10.6 The CEO will within 21 days after receiving the protected disclosure decide on whether to investigate the matter or refer it to another person or body for investigation and inform the person who made the disclosure accordingly.

- 10.7 If it is not possible to take a decision within 21 days, FoodBev SETA will inform the person who made the disclosure, in writing, that it is unable to do so, and thereafter advise the person on a regular basis (at intervals of not more than 2 months at a time) that the decision is still pending. The person will be advised of the decision not later than 6 months after the disclosure was made.
- 10.8 FoodBev SETA does not have to inform the person who made the disclosure of its decision if it is necessary to avoid prejudice to the prevention, detection or investigation of a criminal offence.
- 10.9 If a decision to investigate the matter is taken, the person who made the disclosure will be informed of the outcome of the investigation once the investigation has been concluded.
- 10.10 FoodBev SETA does not have to (and cannot) comply with paragraphs 10.6 to 10.9 above if the disclosure was made anonymously.

11. ACCOUNTABILITY AND RESPONSIBILITY

In order to support the full achievement of the Whistleblowing policy objectives, the accountability of this policy remains with the CEO. The responsibility for the implementation of this policy remains with the Line Manager or delegated official and Employees as detailed below:

Stakeholder	Role
Accounting Authority	<ul style="list-style-type: none"> a) To ensure good governance within the organisation b) Setting the overall tone and culture of transparency and openness within the organisation in its efforts to combat impropriety.
CEO	<ul style="list-style-type: none"> a) To create an environment that encourages compliance with the Whistleblowing policy and avoid occupational detriments. b) To ensure overall compliance with the policy as the Accounting Officer
Corporate Services	<ul style="list-style-type: none"> a) Ensure compliance with this policy. b) Manage any disclosures made to the SM: Corporate Services in line with this policy.
Manager: Legal, Risk and Compliance	<ul style="list-style-type: none"> a) Ensure that this policy is socialized with all staff through training and awareness; b) Monitoring and providing status reports on the disclosures.

Stakeholder	Role
Line Management	<ul style="list-style-type: none"> a) Responsible for providing guidance to employees affected by this policy. b) Responsible for creating an environment that encourages compliance with the policy c) Take disciplinary action for non-compliance to this policy.
Employee	<ul style="list-style-type: none"> a) To familiarize themselves with this policy. b) To comply with this policy. c) To read this policy in line with the Ethics and Anti-fraud policy and the Fraud and Corruption Prevention policy; d) To adhere to the highest standards of excellence and morality in all their activities.

12. NON-COMPLIANCE

Non-compliance with this policy or any applicable regulatory requirement through any deliberate or negligent act or omission, including allowing any staff, either expressly or impliedly, not to comply with this policy or any applicable regulatory requirement, will be considered serious and will be dealt with in terms of FoodBev SETA's Disciplinary and Grievance Policy and Procedure and SETA Code of Conduct. In cases of serious infringements, this may lead to termination of employment.

Furthermore, if a supplier, contractor or other stakeholder refuses to comply with the provisions contained in this policy, the SETA will carefully evaluate whether a relationship with that party can be maintained.

13. DEVIATION

Any deviation(s) to this policy is subject to the sole discretion and approval of the Chief Executive Officer within his/her delegation of authority.

All deviation(s) requests shall be in writing, fully motivated with supporting documentation and addressed to the Chief Executive Officer for his/her approval.

14. POLICY EFFECTIVE DATE

This policy comes into effect on the approval date by the Accounting Authority.

15. DISTRIBUTION OF THIS POLICY AND TRAINING AND AWARENESS

This policy will be communicated and distributed to all FBS employees via e-mail. The policy will also be uploaded onto the FoodBev SETA website.

Once this policy has been approved by the Accounting Authority, training and awareness on the policy will be conducted for all staff. The policy will also be included in the induction pack and new joiners will be trained on the policy as part of their induction.

16. POLICY MANAGEMENT AND REVIEW

The Policy will be reviewed every three (3) years or whenever necessary. Minor changes, such as grammatical corrections or naming conversions may be approved by the Executive Committee if they are not material. Material changes must be approved by the Board.