

Printflow

PRINTFLOW (PVT) LTD

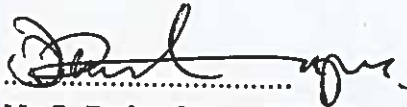
WHISTLE BLOWING POLICY

Description	Whistle blowing policy
Policy Number	PRINTFLOW 06/2024
Compiled by	Audit Department
Review Year	2027
Date of Approval by the Board	27 September 2024

FOREWORD

In pursuit of improving Printflow (Pvt) Ltd's governance framework it is important to adopt a culture of integrity, transparency and trust by encouraging all employees and stakeholders to blow the whistle and report incidents where they may genuinely know or suspect any form of misconduct which may have potential to cause financial, reputational risk or loss to the company.

The whistle blowers policy outlines procedures and protections for individuals who report misconduct, unethical behavior, or illegal activities within the organization. Implementing a forward-thinking whistle blowers policy demonstrates Printflow (Pvt) Ltd's commitment to transparency, accountability, and ethical behavior. It encourages a culture where employees feel empowered to speak up about wrongdoing without fear of reprisal, ultimately contributing to a healthier and more ethical work environment.



Mr J. Dube (Board Chairman)

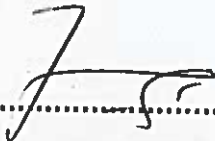
Date: 27 September 2024

PREFACE

Whilst Printflow (Pvt) Ltd's internal controls and operating procedures are expected to detect, prevent or discourage unethical behaviour, complete protection against misdeeds can not be guaranteed. The Policy therefore seeks to contribute towards creating and maintaining a positive culture of ethics by providing a systematic means by which staff and stakeholders are able to raise their concerns on what they see and perceive to be bad practice, for appropriate action to be taken by the company.

The primary purpose of this policy is to:

- Encourage employees to report concerns about unethical, illegal, or improper activities without fear of retaliation.
- Provide a clear and confidential process for reporting such concerns.
- Investigate and address reported concerns promptly and fairly.
- Promote a culture of integrity and ethical behavior within the organization.



.....

D. Takawira (CEO)

Date : 27 September 2024

1. DEFINITION OF TERMS

- 1.1 Anonymous reporting:** Where a report or information is received without disclosing any personal information i.e., without the whistle blowers presenting themselves and leaving any contact information. In this way, nobody in the Company knows whom the report came from.
- 1.2 Open reporting:** It is where the whistle blower have a choice to openly report or disclose information, or state that they do not endeavour to ensure or require their identity to be kept private.
- 1.3 Confidential reporting:** It is where the name and identity of the individual who disclosed information is known by the designated case handlers but will not be disclosed to anyone without the consent of the individual's except when required by law. Once a person sends a confidential report, he/she is automatically covered by the whistle blower protection principles.
- 1.4 Whistleblower:** An employee or any other person who reports suspected unethical, illegal, or improper activities in good faith.
- 1.5 Retaliation:** Any adverse action taken against a whistleblower, such as demotion, termination, or disciplinary action, as a result of their report.
- 1.6 Good Faith:** A sincere belief that the reported activity is unethical, illegal, or improper.

2. RESPONSIBILITY

The CEO shall be responsible and accountable for the implementation of this policy.

3. SCOPE

The policy and procedure shall be applicable to:

- 3.1** Printflow directors and employees.
- 3.2** Stakeholders these include but not limited to (suppliers, customers, entities providing the company with goods or service and members of the public) who wish to report any misconduct without any reservations of retribution.

4. PROCEDURE

The Risk Officer shall cause whistle blowing channels to be known by all employees and stakeholders through the following:

- 4.1** Carrying out awareness campaigns on whistle blowing at least twice a year.
- 4.2** Cause the campaigns to be visible through suggestion boxes, toll free number, the company's website, Facebook page, and/ or other media.

5. GOVERNANCE FRAMEWORK

5.1 Integrity Committee

The Integrity Committee shall:

- 5.1.1 Screen and record any claims of misconduct that are received from Anonymous Tip-Offs, a whistle blower or witness.
- 5.1.2 Provide an acknowledgement of receipt in situations where the identity of the whistle blower is known.
- 5.1.3 Assess the concerns raised to determine whether there is enough evidence to justify an investigation. All credible matters shall immediately be communicated to the Risk Department for investigation.
- 5.1.4 Refer a reported case to relevant departments for evaluation and actioning, preserving the individual's identity, if it falls outside the applicability of this Policy.
- 5.1.5 Where a whistle blower alleges retaliation, the Committee shall refer the matter to the Human Resources Department for appropriate disciplinary action of the person(s) involved.

5.2 Risk Department

The Risk Department shall:

- 5.2.1 Receive reports for investigation from the Integrity Committee and conduct investigations as appropriate.
- 5.2.2 Report the findings of the investigation to the Integrity Committee, Management, and the Board through other the relevant committees.
- 5.2.3 Maintain and update the Whistle blower Tracking Matrix to reflect the disposition of matters raised by employees.
- 5.2.4 Educate staff about their rights and responsibilities and the resources available to them internally and independently to raise concerns and the whistle blower protection measures put in place.

5.3 Internal Audit Department

The Internal Audit Department shall:

- 5.3.1 Conduct regular audits and/or investigations where relevant to assess whether this Policy is being followed appropriately.
- 5.3.2 Receive reports for investigation from the Integrity Committee where the nature of investigations falls outside of the scope of investigations conducted by the Risk Department.

6. REPORTING FRAMEWORK

Reportable Issues

Every employee and concerned stakeholders are responsible for reporting any conduct within Printflow (Pvt) Ltd that the employee/stakeholder reasonably believes tends to show one or more of the following:

- 6.1 That Printflow (Pvt) Ltd is in serious breach of (or is likely to breach) any applicable law or government policy or directive.
- 6.2 That a criminal offence has been committed/is being committed/is likely to be committed including behaviour that might constitute fraud with respect to accounting matters, financial or regulatory reporting which is significantly detrimental to Printflow (Pvt) Ltd or any of its employees.
- 6.3 An act that involves questionable accounting practices or any other financial impropriety by employees.
- 6.4 Conduct that constitutes a serious breach of applicable internal policies and procedures.
- 6.5 Conduct that endangers the health and safety of employees.
- 6.6 Any other activity which undermines the Company's operations and reputation.

7. WHISTLE BLOWING METHODS AND CHANNELS

This Policy provides whistle blowers to choose between anonymous and confidential types of reporting for the purposes of providing a mechanism where whistle blowers can safely report any type of suspicions, incidents, and nonconformities observed in the company in terms of this Policy.

8.1 Internal Reporting Channels

- 8.1.1 All reportable cases, perceived or real, shall be reported anonymously, openly or in confidentially through the Management Integrity Committee using the following dedicated email account and telephone number:

Telephone Numbers: TBA landline

Email Account: integrity@printflow.co.zw

- 8.1.2 In the event of one of the members of the Integrity Committee being personally implicated, the report shall be made directly to the Chief Executive Officer and the Board Chairperson using the following dedicated email address and telephone number: **Email Address: tipoffs@printflow.co.zw**

- 8.1.3 If a board member is mentioned in the tip-off report, the matter shall be escalated to the Minister of Finance, Economic Development, and Investment Promotion using the following contact information:

*The Minister of Finance, Economic Development, and Investment Promotion
3rd Floor, Block E, Mgandane Dlodlo Building (New Government Complex)
Corner Central Avenue and Simon Vengesai Muzenda Street, Harare.*

8.2 External Reporting Channels

8.2.1 Staff and stakeholders can raise concerns through the following toll free channels if they are unable or unwilling to utilize the designated company reporting channels:

Reporting Channel	Channel Details
ZACC	08004367/08010101
POLICE	08080219

8.2.2 The reporting process shall be communicated to employees on joining the company and on a regular basis (at least annually) thereafter.

8.2.3 Employees who are uncertain about whether to submit a report and desire guidance on the factual aspects of the issue or information about the available safeguards, may seek advice and support from the Internal Audit department.

8.2.4 All communications with the Internal Audit department shall be handled confidentially in accordance with the provisions of this Policy.

9. HANDLING OF INFORMATION

9.1 When a tip-off or a report is received through the various media, the Risk Officer shall cause the matter to be investigated.

9.2 If the allegation is of a criminal nature, the matter shall be referred to the Security Officer for investigation as provided under the security procedure manual.

9.3 If the allegation is of any other nature other than criminal, the Risk Officer shall cause the allegation to be investigated and handled as provided by respective internal redress procedures.

9.4 Suggestion boxes shall be opened bi-weekly by the Risk Officer and the workers' representative and shall append their signatures to the suggestion box opening register before opening the box in the presence of the Internal Audit Manager as the witness.

9.5 At the branches the suggestion boxes shall be opened quarterly by a designated member of staff from head office and a workers representative at the branch.

10. POLICY EXCEPTIONS

- 10.1 Staff grievances and allegations of harassment shall be raised through Line Managers and/or the Human Resources Department in terms of the Human Resources Policy and Procedure Manual.
- 10.2 Employees should note that there are statutory requirements to report certain types of misconduct to specific competent authorities. This Policy may be used as an overall policy but may not derogate from such statutory requirements.
- 10.3 Printflow has procedures for responding to complaints from service users which offer the opportunity for the public to seek redress when they feel aggrieved by the way they have been treated or the service they have received from Printflow (Pvt) Ltd.
- 10.4 Stakeholders should therefore refer to the Complaints Handling Procedures which are available on the company website and at all Printflow (Pvt) Ltd's branches.

11. WHISTLE BLOWERS PROTECTION

- 11.1 Printflow is committed to safeguarding the identities of whistle blowers and witnesses, ensuring their information is kept confidential and protected against retaliation except in circumstances where the whistle blower consents to being named and if the identity is required by law.
- 11.2 The company offers secure and anonymous options for reporting any suspected misconduct or malpractice by company personnel, Board Members, or external parties.
- 11.3 Where the identity of the whistle blower is required by law, the Company shall inform the whistle blower prior to revealing his or her identity to law enforcement agencies.
- 11.4 All employees and other stakeholders should therefore be able, in good faith, to report conduct without fear of reprisal or any other detrimental or discriminatory action taken against them.
- 11.5 Employees have the right to request protective measures from the Company through the Integrity Committee if they believe retaliation has occurred or is likely to occur. It is important to note that the Company can only protect whistle blowers within its capabilities.
- 11.6 If it is subsequently found that an employee has knowingly submitted a false report with the intention to accuse or potentially harm another employee or for other malicious reason, the matter shall fall under appropriate disciplinary procedures in terms of the Human Resources Policy and Procedure Manual.
- 11.7 Any retaliatory action against a whistle blower due to their report made in good faith under this Policy shall be considered a misconduct and subject to

appropriate disciplinary action in terms of the Human Resources Policy and Procedure Manual.

12. RIGHTS OF IMPLICATED PERSONS

- 12.1 Implicated employees and stakeholders in a whistle blowing investigation have the right to be notified in writing, responding to the allegations, and defending themselves in terms of applicable polices and governing laws.
- 12.2 All implicated employees and stakeholders shall cooperate during investigations and provide factual and precise information within their knowledge and uphold the confidentiality of the matter.

13. RECORDS RETENTION

- 13.1 All information obtained and work prepared, including but not limited to investigation reports, statements, physical evidence, memos, and notes shall be maintained by the Company in separate and secure files maintained and administered by the Risk Department.
- 13.2 The whistle blowing reports shall be retained for 10 years after which the reports shall be archived and preserved as per the Company's Record Retention Policy.

14. REVIEW

The Policy shall be reviewed every three years or wherever it is necessary, including when changes to other pertinent policies such as the Code of Ethics become necessary.

APPROVED BY THE BOARD OF DIRECTORS OF PRINTFLOW (PVT) LTD



**MR JOSEPH DUBE
BOARD CHAIRMAN**

DATE: 27 September 2024

Whistle Blowing Policy Acknowledgment

I, _____, hereby declare that I have read, understood, and agree to comply with the Whistle Blowing Policy of Printflow (Pvt) Ltd.

I acknowledge that I have been provided with a copy of the Whistle Blowing Policy and have been given the opportunity to ask questions and seek clarification on any aspects of the policy.

I understand that compliance with the Whistle Blowing Policy is a condition of my employment, and any violation of the policy may result in disciplinary action, which may include termination of employment.

Signature.....

Date.....

Designation.....

ID No.....

Witnessed by.....