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## 1. Purpose

Pirtek Africa (Pty) Ltd (the “Company” or “Pirtek”) and its related entities strive to operate with a culture of ethical and appropriate corporate behaviour in all business activities. This includes ensuring that Pirtek and its workers and contractors act with integrity, honesty and in accordance with good governance principles. This purpose is supported by:

- ensuring that Pirtek has sound procedures to allow all employees (and their families), contractors, suppliers, franchisees and the employees of suppliers and franchisees, to identify and report genuine concerns about improper or illegal conduct or any improper state of affairs pertaining to Pirtek, without fear of reprisals; and
- ensuring all employees, contractors and officers of Pirtek are aware of the protections available under this policy and relevant Whistleblower Laws.

## 2. Commencement

This Policy will commence on the date that it is adopted by the Board of Directors of Pirtek Africa (Pty) Ltd. It replaces all other Whistleblower policies (whether written or not).


## 3. Scope

This policy applies to all disclosers, as defined in the “Who May Make Disclosures About Protected Matters” section of this policy, as well as all such persons as defined in the Protected Disclosures Act 26 of 2000 (as amended) (the “PDA”), hereinafter referred to as a “Discloser”.

This policy applies to Pirtek’s employees and officers, contractors, suppliers, franchisees, and the employees of such suppliers and franchisees. Where any such person falls outside the definition of “employee” or “worker” under the PDA, the protections set out in this policy apply to them as a matter of Pirtek policy and (where applicable) contract, rather than as statutory protection conferred by the PDA.

The policy is not intended to create any contractually binding obligation on Pirtek and does not form part of any contract of employment or other contract for engagements with Pirtek, unless such persons are expressly bound to the provisions of this Policy by written agreement.



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#### 4. Variations and Conflicts

Pirtek reserves the right to vary, replace or terminate this Policy from time to time.

Where any conflict arises between this Policy and the Company Memorandum of Incorporation (Mol), the Companies Act, and/or any other law within the Republic of South Africa, the provisions of South African law and the Mol will prevail.

#### 5. Types of Disclosures Protected


A disclosure is defined as:

*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:*

- That a criminal offence has been committed, is being committed or is likely to be committed;
- that a person has failed, is failing or is likely to fail to comply with any legal obligation to which that person is subject;
- that a miscarriage of justice has occurred, is occurring or is likely to occur;
- that the health or safety of an individual has been, is being or is likely to be endangered;
- that the environment has been, is being or is likely to be damaged;
- unfair discrimination as contemplated in Chapter II of the Employment Equity Act, 1998 (Act 55 of 1998), or the Promotion of Equality and Prevention of Unfair Discrimination Act, 2000 (Act 4 of 2000); or
- that any matter referred to in paragraphs (a) to (f) has been, is being or is likely to be deliberately concealed.

The aim of Whistleblower legislation and this Policy is to protect certain defined individuals against occupational detriment (as defined in the PDA; e.g. disciplinary action, dismissal, suspension, demotion, harassment, intimidation, involuntary transfer, alteration of conditions of employment, adverse reference or refusal to provide reference, denial of appointment to office, civil action or criminal complaints, threats of any of the aforesaid, or generally any adverse effect on employment) arising from a protected disclosure made by such a person.



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A protected disclosure means a disclosure made to:

- a legal adviser in accordance with section 5 of the PDA;
- an employer in accordance with section 6 of the PDA;
- a member of Cabinet or of the Executive Council of a province in accordance with section 7 of the PDA;
- a person or body in accordance with section 8 of the PDA; or
- any other person or body in accordance with section 9 of the PDA, but does not, subject to section 9A of the PDA, include a disclosure:
- in respect of which the employee or worker concerned commits a criminal offence by making that disclosure; or
- made by a legal adviser to whom the information concerned was disclosed in the course of obtaining legal advice in accordance with section 5 of the PDA.

This Policy provides protection for disclosures if:

- a disclosure meets the definition of a “protected disclosure” as defined in the PDA; and/or
- the disclosure relates to Protected Matters as defined in the “Protected Matters” section of this policy; and
- the information is disclosed by a Discloser identified in the “Who May Make Disclosures About Protected Matters” section of this policy; and
- the disclosure is made to whistleblower@pirtek.co.za or via the anonymous website channel at <https://pirtek.co.za/whistleblower-disclosure> as set out in the companion Whistleblower Procedure (PA-HR-PRC.0101).


## 6. Protected Matters

The types of disclosures which are further protected are those where the Discloser has reasonable grounds to suspect that the information disclosed concerns material misconduct, or an improper state of affairs or circumstances, in relation to Pirtek.

These types of Protected Matters would include concerns that Pirtek, its employees, officers or contractors have or may have engaged in conduct that:

- constitutes a contravention of the Companies Act 71 of 2008, as amended, or a contravention of any of the laws of the Republic of South Africa;



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- represents a danger to the public or the financial system of the Company, including conduct which endangers (or may potentially endanger) the health and safety of any person or the environment;
- constitutes financial malpractice, impropriety or fraud;
- constitutes a material breach of Pirtek's Code of Business Conduct and Ethics or any other company policy;
- constitutes a material breach of the Franchising Code of Conduct;
- constitutes a failure, or a likely failure, to comply with any legal obligation to which a person is subject;
- constitutes a miscarriage of justice that has occurred, is occurring or is likely to occur;
- constitutes unfair discrimination as contemplated in the Employment Equity Act, 1998 or the Promotion of Equality and Prevention of Unfair Discrimination Act, 2000; and/or
- any attempt to conceal any of the above conduct

(the "Protected Matter/s").

The above applies regardless of whether the conduct occurred within or outside South Africa, and regardless of whether the law governing the conduct is South African law or that of another country, in accordance with the Protected Disclosures Act 26 of 2000 (as amended).

## 7. Workplace Compliance


This Policy is intended to protect Disclosers making Protected Disclosures pursuant to a contravention of law or breach of legal duty occurring within Pirtek. This Policy is not intended to be utilised as a compliance and/or grievance resolution process.

Employees and representatives of Pirtek should always attempt to resolve any workplace compliance issues within the entity they are employed by in the first instance. However, if:

- workplace compliance issues are unable to be resolved at an entity-level and/or occur repeatedly;
- the Discloser believes that conduct forming the subject of an intended Disclosure amounts to a deliberate breach of duty or contravention of law; or
- the employee feels their employment, health or safety would be jeopardised by reporting such a matter at an entity-level,

Pirtek will treat Disclosures in accordance with this policy if the discloser requests this at the time of the initial report and Pirtek will assess whether the disclosure qualifies as a protected disclosure under the PDA. Whether the protections of the PDA apply is determined by the requirements of the PDA itself and is not subject to the discretion of Pirtek or its management.



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## 8. Personal Work-Related Grievances

The disclosure of information related to a personal work-related grievance is not generally protected by Whistleblower Laws or this Policy. A personal work-related grievance relates to information where:

- the information concerns a grievance in relation to a person's employment or former employment which has implications for the person personally;
- the information does not have significant implications for Pirtek that do not relate to the person; and
- the information does not concern conduct or alleged conduct referred to in the "Protected Matters" section of this policy or such conduct relating to a Disclosure as defined in the PDA.

Examples include interpersonal conflicts, decisions regarding promotion or transfer, and decisions to discipline or terminate an employee or contractor.

Where a matter is not a protected disclosure, it can still be raised through the appropriate channel. Employees who wish to raise a personal work-related grievance should do so through Pirtek's HR grievance procedure rather than this policy. Suppliers, franchisees and the employees of suppliers and franchisees who have a concern that is not a protected disclosure may raise it with their usual Pirtek commercial contact or by emailing [info@pirtek.co.za](mailto:info@pirtek.co.za). Directing a matter to the correct process does not remove any protection that would otherwise apply under the PDA if the matter is in fact a protected disclosure.

## 9. Limitation of Protection


This policy does not protect disclosers against criminal liability or civil liability which may arise due to the disclosure of false information (as inter alia envisaged in section 9B of the PDA).

## 10. Who May Make Disclosures About Protected Matters

Each of the following persons may make a protected disclosure:

- Pirtek employees and officers as well as their relatives and dependants;
- contractors of Pirtek;
- suppliers of goods or services to Pirtek; and



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- employees of suppliers of goods or services to Pirtek.
- franchisees of Pirtek; and
- employees of franchisees of Pirtek.


## 11. Anonymous Disclosures

Protected disclosures may be made anonymously. Pirtek offers three clearly defined channels depending on whether you wish to remain anonymous and whether you would like to receive feedback on your disclosure.

Under the PDA, a protected disclosure may also be made to a legal adviser, to the Public Protector or the Auditor-General, or to another authorised person or body recognised under the PDA. Use of Pirtek’s channels is encouraged but is not a precondition for protection under the PDA.

<b>Channel</b>	<b>How to use it</b>	<b>Anonymous?</b>	<b>Feedback possible?</b>
<b>Channel 1 — Named</b>	Email whistleblower@pirtek.co.za from your own email address with your name and contact details.	No	Yes — direct reply
<b>Channel 2 — Anonymous with feedback</b>	Create a free anonymous email account with ProtonMail (proton.me) — no personal information required — and email whistleblower@pirtek.co.za from that address.	Yes	Yes — via reply to anonymous address
<b>Channel 3 — Anonymous, no feedback</b>	Protected disclosures, without any feedback, can also be made anonymously via the Pirtek website using the link: <a href="https://pirtek.co.za/whistleblower-disclosure">https://pirtek.co.za/whistleblower-disclosure</a>	Yes — website form, no account required	No



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## 12. Disclosures to Politicians, Journalists, or Other Parties

A Disclosure of a protected matter to a journalist or member of state or parliament, or any other person or body will be protected by this policy only to the extent provided for and required by the PDA (as amended) (i.e. section 9 of the PDA).

## 13. Public Interest Disclosures

Subject to the above application of section 9 of the PDA, a disclosure will further be protected under this policy if all of the following requirements are satisfied:


- the Discloser has previously made a disclosure relating to a Protected Matter to whistleblower@pirtek.co.za;
- a reasonable period has passed since the previous disclosure was made (what constitutes a reasonable period will depend on the nature and urgency of the matter, and Pirtek will not apply a fixed minimum period where the seriousness of the conduct requires more prompt action);
- the Discloser does not have reasonable grounds to believe that action is being or has been taken to address the previous disclosure;
- the Discloser has reasonable grounds to believe that making a further disclosure to a member of Parliament or journalist would be in the public interest;
- the Discloser has given written notification to whistleblower@pirtek.co.za identifying the previous disclosure and stating that the Discloser intends to make a public interest disclosure; and
- the extent of information disclosed is no greater than is necessary to inform the journalist or member of Parliament of the relevant misconduct.

## 14. Emergency Disclosures

Subject to the above application of section 9 of the PDA, a Disclosure will further be protected under this policy if all of the following requirements are satisfied:

- the Discloser has previously made a disclosure relating to a Protected Matter to whistleblower@pirtek.co.za;



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- the Discloser has reasonable grounds to believe that the information concerns a substantial and imminent danger to the health or safety of one or more persons or to the natural environment;
- the Discloser has given written notification to whistleblower@pirtek.co.za identifying the previous disclosure and stating that the Discloser intends to make an emergency disclosure; and
- the extent of information disclosed is no greater than is necessary to inform the journalist or member of Parliament of the substantial and imminent danger.

## 15. Confidentiality

The identity and personal information of a Discloser (and that of a person who forms the subject/accused in a Protected Matter) will be protected to the extent required by law.

Generally, the identity and personal information of persons involved in a Protected Disclosure may only be disclosed to the extent that:


- the persons in question consent to such disclosure; or
- the disclosure of such information is reasonably done and pursuant to compliance with a legal obligation or Order of Court; or
- a data subject (as defined in the Protection of Personal Information Act 4 of 2013 (as amended) ("POPIA")) has made such information public deliberately; or
- the disclosure is made to a legal practitioner for the purposes of obtaining legal advice about the Whistleblower Laws or a duty to the Discloser; or
- the disclosure of such information is done in the performance of a public law duty and/or for a legitimate interest, and/or contractual necessity.

Persons may also disclose the existence of the Protected Matters (without disclosing the identity of the Discloser) to the extent necessary for the matters to be investigated, provided all reasonable steps are taken to reduce the risk that the Discloser's identity can be discovered.

## 16. Protection for Discloser

If a Discloser makes a Disclosure pursuant to the PDA (as amended) and this Policy in good faith and, where required by the PDA, with a reasonable belief that the information disclosed is substantially true, such a Discloser may not be subject to an occupational detriment from the Company.



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No contract of employment or contract for services can be terminated on the basis that a protected disclosure made in good faith constitutes a breach of contract.

Making a disclosure protected by Whistleblower Law does not remove or reduce liability from a discloser for any potential wrongdoing they may have been a party to, whether or not it is related to the disclosure being made.

Protections provided by this policy do not apply to an individual who has not acted in good faith in making a disclosure under this policy.

## 17. Compensation and Other Remedies

A Discloser, or person who has been implicated in a Protected Matter, reserves their rights to claim for loss, damage or injury because of an unlawful disclosure.

## 18. Victimisation Prohibited

All persons bound to this policy shall be guilty of misconduct and/or a breach of contract if they:


- engage in any conduct or partake in actions that amount to an occupational detriment (as defined in the PDA) to any person because that person (or another person) made a disclosure about a Protected Matter; or
- carry out any threats to cause detriment to any person (whether express or implied) because that person (or another person) made a disclosure about a Protected Matter.

Where a person or entity engages in breaches of these protections, Pirtek reserves the right to take whatever remedial action is available to it.

## 19. Vexatious or Disingenuous Disclosures

Where it is established by Pirtek that a person purporting to be a protected whistleblower has made a vexatious or disingenuous report of improper conduct, that conduct itself will be gross misconduct which may further amount to a breach of contract (where relevant) and/or result in dismissal proceedings. The person involved may face disciplinary action up to, and including, termination of employment (for employees) or termination of contract of service (for contractors, officers or suppliers).



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## 20. Disclosures Involving Senior Management

Pirtek recognises that a disclosure may, in some instances, relate to the conduct of the Whistleblower Protection Officer (WPO), a member of senior management, or a director of Pirtek. In such cases, directing the disclosure to the WPO or to management could create a potential conflict of interest and could undermine the purpose of this policy. A discloser whose concern relates to the WPO or senior management may consider bypassing the internal channel entirely and make their disclosure directly to one of the following external authorised persons or bodies, all of whom are recognised under the Protected Disclosures Act 26 of 2000 (as amended):

- The Public Protector ([www.publicprotector.org](http://www.publicprotector.org));
- The Auditor-General of South Africa ([www.agsa.co.za](http://www.agsa.co.za));
- The South African Police Service (SAPS) where a criminal offence is involved; or
- Any other body or third party envisioned by the Protected Disclosures Act 26 of 2000 (as amended) as an authorised recipient of protected disclosures.

A discloser who uses an external channel in these circumstances is afforded the same protections under the Protected Disclosures Act 26 of 2000 (as amended) as a discloser who reports internally.


## 21. Legal Assistance

All persons to whom this Policy applies are recommended to seek independent legal advice in the event that any uncertainty exists with respect to their rights and obligations under this Policy.

Where a discloser is involved in a matter before a court or tribunal arising from a protected disclosure and cannot afford legal representation, the court or tribunal may, under the Protected Disclosures Act 26 of 2000 (as amended), refer the matter to Legal Aid South Africa for representation at state expense where substantial injustice would otherwise result. Pirtek will not oppose any such referral and will support a discloser's right to seek legal assistance. A discloser in this position should inform the presiding officer and the WPO. Legal Aid South Africa is required to maintain the same confidentiality obligations applicable to the discloser under the Act.

Legal Aid South Africa: [www.legal-aid.co.za](http://www.legal-aid.co.za) | Tel: 0800 110 110 (toll-free).



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## 22. Revocation of Protection

Pirtek may determine that a disclosure does not meet the requirements of a protected disclosure under the PDA. Pirtek cannot unilaterally remove the statutory protection conferred by the PDA — whether the protection applies is ultimately determined by a court or tribunal. Pirtek may reach such a determination where it is established, during or after an investigation conducted by Pirtek, that:

- the discloser participated or continued to participate in the improper conduct after making the disclosure;
- the discloser intentionally made a material statement they knew to be false;
- the disclosure was made solely or substantially to avoid dismissal or disciplinary action; or
- the discloser committed an offence while making the disclosure or providing further information which has not been condoned by Order of Court.

Where Pirtek (acting through the WPO) makes such a determination, the discloser will be given written notice to that effect. A discloser who is aggrieved may approach a court with jurisdiction. The discloser's protection continues in full while any challenge to the determination is pending, unless a competent Court orders otherwise.

## 23. Protection of Personal Information — POPIA Compliance


The processing of personal information pursuant to a Disclosure may in certain instances be governed by the Protection of Personal Information Act 4 of 2013 (POPIA). Pirtek is bound to process all such information in strict accordance with POPIA.

This policy must therefore also further be read together with Pirtek Africa's POPIA Policy (PIRHO 4.52 POL-0800.05, as amended from time to time).

## 24. Review

Pirtek will review this policy from time to time, as circumstances require, and at least every two years, or sooner where required by a change in applicable law or a material change in Pirtek's operations. Any review will be conducted in conjunction with the POPIA compliance audit conducted by the Information Officer in accordance with PIRHO 4.52 POL-0800.05.




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## 25. Definitions / Glossary of Key Terms

<b>Term</b>	<b>Definition</b>
<b>Data Breach</b>	Any unauthorised access to personal information held by Pirtek in the context of a whistleblower disclosure, as defined in PIRHO 4.52 POL-0800.05.
<b>Data Subject</b>	A person to whom personal information relates; in the whistleblower context this includes the discloser and any person named in a disclosure.
<b>Discloser(s)</b>	Persons eligible to make a disclosure protected by Whistleblower Laws, as identified in the “Who May Make Disclosures About Protected Matters” section.
<b>Information Officer</b>	The individual responsible for ensuring Pirtek’s compliance with POPIA, as defined in PIRHO 4.52 POL-0800.05.
<b>Officer</b>	Consistent with the Companies Act 71 of 2008: a director or secretary of the company, or a person who makes or participates in decisions affecting the whole or a substantial part of the business, or who can significantly affect the company’s financial standing.
<b>Operator</b>	A third party that processes personal information on behalf of Pirtek under a contract or mandate, as defined in POPIA.
<b>Personal Information</b>	Any information relating to an identifiable, living natural person, as defined in POPIA and PIRHO 4.52 POL-0800.05.
<b>Pirtek</b>	Pirtek Africa Pty Ltd and its related body companies, associated entities and any entity which is a Pirtek Franchise.
<b>POPIA</b>	The Protection of Personal Information Act 4 of 2013, as amended from time to time.
<b>POPIA Policy</b>	PIRHO 4.52 POL-0800.05 — Pirtek Africa POPIA Policy, as amended from time to time.
<b>Protected Matters</b>	The types of matters outlined in the “Protected Matters” section of this policy, protected by Whistleblower Laws.
<b>Responsible Party</b>	The party responsible for ensuring compliance with POPIA when processing personal information. Pirtek is the Responsible Party in the context of this policy.
<b>Whistleblower Laws</b>	The Protected Disclosures Act 26 of 2000 (as amended).
<b>WPO</b>	Whistleblower Protection Officer — the designated person responsible for receiving and managing disclosures under this policy and the companion procedure PA-HR-PRC.0101.

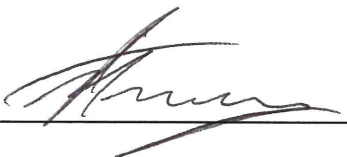


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## 26. Document Control

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<b>Document number</b>	PA-HR-POL.0100
<b>Version</b>	Rev: 2026
<b>Effective date</b>	[Date of Salt Capital VCP committee and Pirtek executive management adoption]
<b>Approved by</b>	M Pennefather — Managing Director
<b>Document owner</b>	[To be appointed]
<b>Review date</b>	[24 months from effective date, or earlier on statutory change]
<b>Companion document</b>	PA-HR-PRC.0101 — Whistleblower Procedure
<b>Cross-reference</b>	PIRHO 4.52 POL-0800.05 — Pirtek Africa POPIA Policy
<b>Applicable law</b>	Protected Disclosures Act 26 of 2000 (as amended); POPIA 4 of 2013; Companies Act 71 of 2008; Franchising Code of Conduct

**Approved by: Matt Pennefather — Managing Director**

Signature: 

Date: 23/06/2026