



Schweizer Agriculture Limited

Whistleblowing Policy & Procedure
Approved by: Board of Directors

Version: 1.0
Effective Date: January 2023

1. Purpose and Scope

This Whistleblowing Policy provides a structured and confidential mechanism for employees, contractors, consultants, suppliers, and stakeholders to raise concerns regarding unethical, illegal, or improper conduct within Schweizer Agriculture Limited (SAL). It supplements the Code of Conduct and the Anti-Bribery & Anti-Corruption Policy, reinforcing our commitment to honesty, transparency, accountability, and zero tolerance for corruption, fraud, harassment, and misconduct.

2. What Can Be Reported?

Concerns may include, but are not limited to:

- Bribery, corruption, facilitation payments
- Fraud, theft, or misuse of assets
- Conflicts of interest or abuse of position
- Harassment, discrimination, or bullying
- Health & safety violations
- Financial misreporting or falsification of records
- Retaliation against whistleblowers

3. Reporting Channels

Whistleblowers may raise concerns through confidential channels:

- Ethics & Compliance Officer
- Dedicated whistleblowing email: whistleblowing@schweizeragriculture.co.zm
- Hotline / SMS: +260 972-384-106
- Whistleblowing box at SAL premises
- Direct escalation to the Managing Director, Audit Committee, or Board

Anonymous reporting is permitted; however, detailed information helps investigations.

4. Confidentiality & Protection

All reports will be treated with the highest confidentiality. The identity of whistleblowers will not be disclosed without consent, except where legally required. Employees will not face retaliation for raising concerns in good faith. Retaliation against whistleblowers will itself be treated as gross misconduct.

5. Procedure for Handling Reports

Step 1: Acknowledgment – Ethics Officer acknowledges receipt within 7 working days.

Step 2: Initial Assessment – Determine if the issue qualifies as whistleblowing; assess seriousness and credibility.

Step 3: Investigation – Conducted by Ethics Officer or independent investigator; may involve document review and interviews.

Step 4: Outcome & Reporting – Findings documented in a written report; corrective actions or referral to authorities.

Step 5: Feedback – Whistleblower informed of outcome where possible, subject to confidentiality.

6. Responsibilities

Employees must report misconduct in good faith. The Ethics Officer receives and investigates reports; the Compliance Manager ensures alignment with anti-bribery obligations. Supervisors foster open culture; Board/Audit Committee oversee policy effectiveness.

7. Record Keeping & Monitoring

All reports, investigations, and outcomes will be securely documented. Reports will be anonymized for statistics. Quarterly updates will be submitted to management and the Audit Committee.

8. Training & Communication

All staff will receive induction and refresher training on whistleblowing. The policy will be communicated internally and to external partners. Awareness campaigns will reinforce compliance.

9. Review of Policy

This policy will be reviewed annually by the Ethics Officer, Compliance Manager, and Audit Committee to ensure effectiveness and compliance with legal requirements.