



**IMPALA PLATINUM HOLDINGS LIMITED**

**FRAUD, CORRUPTION AND  
WHISTLEBLOWING POLICY**

**1 August 2018**

**Mr NJ Muller  
Chief Executive Officer**

**Ms D Earp  
Chairman of the Audit Committee**

**Dr MSV Gantsho  
Chairman of the Board**

## 1. FRAUD, CORRUPTION AND WHISTLEBLOWING POLICY

### A Purpose

To ensure that all Staff Members of Impala Platinum Limited, Marula and Zimplats practice a culture of **Zero Tolerance** on fraud and corruption. Our organisation endeavours to create an environment that encourages an anti-fraud and anti-corruption culture through:

- fraud/ corruption awareness campaigns; and
- encouraging honesty, openness, co-operation and mutual respect across all functions, Suppliers/ Vendors and Contractors with whom we conduct business.

This is in line with some of our organisational core values that we respect:

- open and honest communication;
- the principles of the UN Global Compact; and
- the laws of the countries within which we operate, in all our dealings.

### B. Scope:

This policy applies to all employees of the Implats group.

### C. Policy Statement

Implats is committed to the highest standards of personal and professional ethical behaviour. The Board of Directors of Implats have a "**Zero Tolerance**" stance against corruption, fraud, misconduct or any dishonesty.

Implats will not tolerate any act of fraud and corruption, committed by all Staff Members of Impala Platinum Limited, Marula and Zimplats. Appropriate, consistent and immediate action (including dismissal and legal action) will be taken against those persons committing fraud and corruption irrespective of the length of service or position in the organisation.

Implats endeavours to comply with the laws and regulations of the countries in which it operates. Amongst others, Implats will comply with the South African Prevention and Combating of Corrupt Activities Act ("PRECCA"), The Protection of Whistle blower Act of 1989 as well as the UK Bribery Act 2010.

All allegations reported will be investigated, each to its logical conclusion and reported to the right levels of the organisation for appropriate action to be taken in application of this policy. The irregularities identified during the course of an investigation will be investigated accordingly as well as suspected irregularities identified during audit procedures.

Implats strongly believes that it has a responsibility to take an active stand against fraud, corruption or any misconduct. This extends to all Implats' dealings and transactions wherever it conducts its business.

Implats advocates the principles of shared values and depends on every Employee to comply, without exception, with the provisions contained in this policy and to direct enquiries to the Forensic unit of Group Internal Audit of Implats in the event of any doubt in this regard, contact details:

**Michelle Snyders, Forensic Audit Manager**

Email: [michelle.snyders@implats.co.za](mailto:michelle.snyders@implats.co.za)

Cell: 082 304 4598

**To report all suspected fraud, corruption and misconduct, please phone 0800 005 314, available 24hrs, seven days in all the official languages and more.**

**This Policy should be read in conjunction with the Implats Code of Ethics.**

**ANNEXURE A**

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**ACKNOWLEDGEMENT**

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I the undersigned

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being a director/an employee of Impala Platinum Holdings Limited do hereby acknowledge receipt of the Fraud, Corruption and Whistleblowing Policy; I have read, understood and undertake to abide by the contents of the attached policy.

Signed at ..... on the.....day of .....20.....

.....  
**SIGNATURE**

.....  
**WITNESSES:** .....

**DATE:** .....