

It is the desire and aim of the DGI TRADING to develop, promote and maintain high standards of corporate governance within DGI TRADING. We do not tolerate any corporate impropriety, malpractice or wrongdoing by staff in the course of their work.

Employees are often the first to realise that there may be irregularities within a company. However, employees may not express their concerns for fear of being disloyal to their colleagues or to the company. They may also be afraid of discrimination or harassment. In such circumstances employees may feel that it is best to ignore the concern rather than report. Similarly, External parties who have dealings with the company (such as customers and suppliers) may also avoid raising a concern of potential irregularities for the same reasons.

Complaints

Every complaint shall be made in person or in writing and shall be lodged with the DGI TRADING CEO as follows: CEO's email address is as follows:-

kabelo.mashigo@dgitrading.co.za

A complainant who raises a genuine concern under this Policy will not be at risk of losing his/her job or suffering from retribution or harassment as a result. Provided that the Complainant is acting in good faith, it does not matter if he/she is mistaken.

When making a report, the complainant should as far as possible include the following information:

- name,
- designation,
- department,
- contact number, and
- email where applicable
- Date, time and place of the alleged Possible Improprieties;
- Identity and particulars of the parties involved;
- Circumstances leading to the Possible Improprieties; and
- Any other relevant information or documentation that would assist in the evaluation of the report.

Confidentiality

Every effort will be made to protect the complainant's identity.

The identity of the complainant shall be confidential save where:

- the identity of the complainant is material to any investigation;
- the information is given, on a confidential basis, to legal or auditing professionals for the purpose of obtaining professional advice;

This is to facilitate appropriate follow-up questions and investigations which may not otherwise be possible unless the source of the information is identified. However, in cases of anonymous complaints where information provided is comprehensive and deemed sufficient to warrant an investigation, the DGI TRADING CEO may decide to proceed with an investigation.

Registration of Complaints

The DGI TRADING CEO shall maintain or cause to be maintained a Complaints Register for the purposes of recording all Complaints received, the date of such Complaint, the nature of such Complaint and all action taken relating to the Complaint.

The DGI TRADING CEO shall approve making the Complaints Register available for inspection upon any request by investigating authorities.

Review and Investigation of Complaint

Upon receipt of any Complaint, the DGI TRADING CEO may:

- conduct his/her own investigation or review;
- instruct any relevant / chosen regulatory body or relevant management to conduct further investigations or review;
- instruct the relevant management to take such remedial action as it deems appropriate;
- engage such third parties as the DGI TRADING CEO may determine, to take remedial action, to commence or conduct further investigations or review, as may be appropriate;
- report the matter to the authorities if deemed necessary upon consultation with legal counsel;
- inform the complainant of the likely timeline for a final response and notify the complainant of actions taken or reason(s) should it be decided that no action is to be taken; and/or
- take any other action as DGI TRADING CEO may determine in the best interests of DGI TRADING.

Obstructive action and Retaliatory Action

- The Company objects to and does not tolerate nor condone any Obstructive Action being taken against any whistleblower who wishes or intends to, or who is in the process of filing a Complaint, and may institute disciplinary action or such other appropriate action against any employee, officer or person found to have taken such Obstructive Action.

- The Company objects to and does not tolerate nor condone any retaliatory action taken against any whistleblower who has filed a Complaint and may institute disciplinary action or such other appropriate action against any employee, officer or person found to have taken such retaliatory action.
- Any complaint alleging Obstructive Action or Retaliatory Action shall be received, reviewed and investigated by the Company and appropriate action taken where relevant.

Frivolous or Malicious Complaints

Any person who files a Complaint which is frivolous, in bad faith, in abuse of these policies and procedures or with malicious or mischievous intent, will not be protected by this Policy and may be subject to administrative and/or disciplinary action including but not limited to the termination of employment or other contract, as the case may be.

Consistency with Laws and Regulations

This Policy shall be read in conjunction with any laws, regulations, rules, directives or guidelines as per ALL relevant ACTS, REGULATIONS and BYLAWS, which are listed for employees convenience within the DGI TRADING Legal Register, which may from time to time prescribe or issue on the receipt, retention and/or treatment of complaints regarding, documentation and records controls and or any matters governed by this policy.

In the event that any policy or procedure herein is inconsistent or in conflict with the laws, regulations, rules, directives or guidelines, and/or any part thereof, the laws, regulations, rules, directives or guidelines as prescribed by the government of our country South Africa, shall prevail to the extent of such inconsistency or conflict.

Maintaining This Policy

The DGI TRADING CEO has the responsibility for ensuring the maintenance, regular review and updating of this policy. Revisions, amendments and alterations to this policy can only be implemented via approval by the DGI TRADING CEO and or the Board of Directors. Employees will be notified in writing of all changes as and when they occur.