



## WHISTLEBLOWING POLICY

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### 1. Introduction

Coronation is committed to conducting business with honesty and integrity, which serves the best interests of our staff, clients, other stakeholders and the long-term sustainability of our business. Coronation has therefore created this group wide Whistleblowing Policy, applicable to Coronation Fund Managers Ltd and all its subsidiaries (“Coronation”).

In addition, The Protected Disclosures Amendment Act (Act 5 of 2017) (“the Act”), places an obligation on employers to establish internal procedures for the reporting of any impropriety.

Every employee has a responsibility to disclose any actual or potential criminal, unethical or other irregular conduct in the workplace (collectively “inappropriate conduct”). An employer has a responsibility to take all necessary steps to ensure that employees who disclose such information, in good faith, are protected from any reprisals as a result of such disclosure.

Reportable instances of inappropriate conduct include, but is not limited to, knowledge of actual or potential:

- Criminal offences;
- Unethical, dishonest or irregular conduct;
- Failure to comply with legal obligations;
- Miscarriages of justice;
- Endangering of the health and safety of individuals;
- Damage to the environment; and
- Unfair discrimination as defined in the Employment Equity Act and the Promotion of Equality and Prevention of Unfair Discrimination Act.

Employees are encouraged to report any inappropriate conduct to senior management immediately. All reports that are made will be treated confidentially.

Coronation acknowledges that circumstances may exist in which an employee might feel more comfortable reporting anonymously. For this reason, Coronation has subscribed to an external service which enables employees to report inappropriate conduct anonymously.

### 2. Whistleblowing Hotline

Anyone can contact our third-party provider, “Tip-offs Anonymous®”, as follows:

FreeCall phone	0800 000 535 (South Africa) 0800 003 313 or 91847 for MTC users (Namibia) +27 31 571 5107 or 08081891196 (United Kingdom) +27 31 571 5107 or 1-800-901-705 (Ireland)
FreeCall fax	0800 00 77 88
Unique e-mail	<a href="mailto:coronation@ethicsline.co.za">coronation@ethicsline.co.za</a>
FreePost address	Tip-offs Anonymous® FreePost KZN 138 Umhlanga Rocks 4320



### 3. Whistleblowing Process

The following can be expected on contacting the hotline:

- Trained operators, using sophisticated contact centre equipment, will respond to phone calls in English 24 hours a day, 365 days per year. Between 08h00 and 17h00 the contact centre can respond to calls in the eleven official languages spoken in South Africa.
- Operators will interview callers, probing for specific facts to record as much information and understand the matter as clearly as possible.
- In the event of a legitimate report, “Tip-offs Anonymous®” will notify the following persons simultaneously in writing within 24hrs of the report being made: the Chief Executive Officer, the Head of Global Risk & Compliance, the independent non-executive Chairperson of Coronation’s Social, Ethics and Transformation Committee and the independent non-executive Chairperson of Coronation’s Risk Committee. This group will review the report and take whatever steps are necessary to fully investigate and conclude the matter.

The “Whistleblowing Hotline” is not designed for general complaints or grievances and should not be used for this purpose. Personnel related issues should always be addressed with management and/or the Talent Management Department.

### 4. Securities & Exchange Commission: Office of the Whistleblower

In the United States, the SEC’s Office of the Whistleblower was established to administer the SEC’s whistleblower programme. For more information about the SEC’s whistleblower program, including how to submit a tip or complaint to the SEC, please see <https://www.sec.gov/whistleblower>.

For the avoidance of doubt, nothing in this Policy prohibits employees from reporting potential violations of U.S. federal law or SEC regulations to any U.S. governmental agency or entity, including but not limited to the SEC or the Department of Justice, or from making other disclosures that are protected under the whistleblower provisions of U.S. federal law or regulations. Employees do not need prior authorization from their supervisor, the Chief Compliance Officer, or any other person or entity affiliated with Coronation to make any such reports or disclosures and do not need to notify Coronation that they have made such reports or disclosures.

### 5. Policy Approval

Date	Action
Feb 2022	Reviewed and approved by the Head of Global Risk & Compliance
Feb 2023	Reviewed and approved by the Head of Global Risk & Compliance
Feb 2024	Reviewed and approved by the Head of Global Risk & Compliance
Feb 2025	Reviewed and approved by the Head of Global Risk & Compliance