

TABLE OF CONTENTS

REFERENCE LIST

INTRODUCTION

SCOPE AND OBJECTIVE

APPLICABILITY

POLICY INFORMATION

NON-COMPLIANCE/  
CONSEQUENCE MANAGEMENT



**CRICKET**  
SOUTH AFRICA

# POLICY

# WHISTLEBLOWING

This Whistle Blowing Policy is to reinforce the Code of Ethics and provide assurance to all staff, contractors and other stakeholders related to Cricket South Africa that they will be protected from any penal action or victimisation arising from any legitimate matters reported through any of the reporting channels provided for by Cricket South Africa.

Consideration was given to all relevant regulations and best practice. Management is required to revise the policy and procedures as and when the need arises.

All CSA employees are responsible for familiarizing themselves with this policy and understanding their positive obligations in relation to complying with this policy.

The policies will be audited by Internal audit on a regular basis to allow for regular updates and flexibility to address any pressing issues and to ensure policies remain relevant with the changing practices with laws and regulations.

The Board will review policies every three years, should no matters arise under normal circumstances.

Document Owner	Risk and Compliance
Document Sponsor	CEO
Reviewed	Audit, Governance And Risk Committee
Approved by	Board of Directors
Revision date	October 2026
Effective date	October 2023

## Table of Contents

<b>1.</b>	<b>Reference List .....</b>	<b>4</b>
<b>2.</b>	<b>Definitions .....</b>	<b>4</b>
<b>3.</b>	<b>Introduction.....</b>	<b>5</b>
<b>4.</b>	<b>Statement.....</b>	<b>5</b>
<b>5.</b>	<b>Scope and Objective .....</b>	<b>5</b>
<b>6.</b>	<b>Applicability .....</b>	<b>6</b>
<b>7.</b>	<b>Policy Information.....</b>	<b>6</b>
7.1	Acting in Good Faith .....	6
7.2	Reporting Channels.....	7
7.3.	Safeguards – Harassment and Victimisation.....	7
7.4	Definition of a Disclosure.....	7
<b>8.</b>	<b>Reporting and Recording of Disclosures.....</b>	<b>8</b>
<b>9.</b>	<b>How will the Company Respond .....</b>	<b>8</b>
<b>10.</b>	<b>The Responsible Officer .....</b>	<b>9</b>
<b>11.</b>	<b>Creating Awareness.....</b>	<b>9</b>
<b>12.</b>	<b>Non-Compliance/Consequence management.....</b>	<b>9</b>

## 1. Reference List

1.1 The following legislative and regulatory framework is relevant to this policy:

- a) Protected Disclosures Act 26 of 2000
- b) Prevention and Combating of Corrupt Activities Act 12 of 2004
- c) Prevention of Organized Crime Act 121 of 1998
- d) The United Kingdom's Bribery Act 2010
- e) The United States of America's Foreign Corrupt Practices Act of 1977
- f) Protection of Personal Information Act No 4 of 2013
- g) Companies Act 71 of 2008 (as amended)
- h) The National Sport and Recreation Act 110 of 1998 (as amended)
- i) King IV Report on Corporate Governance for South Africa, 2016
- j) National and International Sporting Codes and Laws e.g. Code of the Laws of Cricket
- k) International Cricket Council - Code of Conduct
- l) Organisation for Economic Cooperation and Development (OECD) recommendations regarding corruption and the United Nations Global Compact Principles (in particular, Principle 10)

1.2 The following policies are in place at CSA and should be read in conjunction with this policy:

- a) CSA Code of ethics
- b) Gift Policy
- c) Fraud and Corruption policy
- d) Delegation of authority
- e) Disclosure of business interests
- f) Risk Management Policy
- g) Disciplinary code and procedures
- h) Procurement Policy

1.3 Any references in this policy to an Act, policy and/or agreement shall be to such Act, policy and/or agreement as amended from time to time.

## 2. Definitions

In this policy, the following terms shall mean the following:

- 2.0.1 "CSA" – Cricket South Africa NPC, or by whatever other name it may be known from time to time.
- 2.0.2 "EXCO" – CSA's management committee responsible for the day-to-day tasks of managing the Company with direct reports to the CE.
- 2.0.3 "fraud" – the unlawful and intentional making of a misrepresentation (i.e. representing that a fact exists when it does not) which causes actual prejudice or which is potentially prejudicial to another. A misrepresentation can be in the form of an omission (i.e. omitting to disclose

certain facts when there is a legal duty to disclose such facts and all CSA stakeholders are under an ongoing and positive obligation to make any such disclosures to CSA, as soon as they become apparent. A failure to do so will result in disciplinary action).

2.04 “Stakeholders” – Media; players; customers; Statutory entities; Communities; Employees; CSA Sponsors; CSA Members.

2.05 “MOI”– CSA’s Memorandum of Incorporation, as amended from time to time.

### 3. Introduction

Cricket South Africa is committed to the highest standards of ethical, moral and legal business conduct. Ethical business behavior is the responsibility of every person in the company and is reflected not only in our relationships with each other but also with our customers, suppliers and other stakeholders. The Cricket South Africa Code of Ethics and related corporate policies are a key component of its commitment to high standards of business and personal ethics in the conduct of its business.

In line with this commitment we expect stakeholders and others that we deal with, who have serious concerns about any aspect of CSA’s work to come forward and communicate these concerns through the appropriate channels provided by the company, without any concerns or fear of victimisation. It is recognised that wherever practical, and subject to any legal constraints, matters reported will be dealt with on a confidential basis.

All Cricket South Africa stakeholders are strongly encouraged to report their concerns through the normal business channels, which can include, for example, human resources representatives, compliance or EXCO representatives.

The introduction of Cricket South Africa’s anonymous whistleblowing line is a supplementary reporting mechanism through which to raise concerns, if for any reason you are uncomfortable using the normal business channels or unsatisfied with the response from the normal business channels. The system is available for use by all Cricket South Africa stakeholders.

### 4. Statement

This Whistle Blowing Policy is to reinforce the Code of Ethics and provide assurance to all staff, contractors and other stakeholders related to Cricket South Africa that they will be protected from any penal action or victimisation arising from any legitimate matters reported through any of the reporting channels provided for by Cricket South Africa.

### 5. Scope and Objective

5.1 This Whistle Blowing Policy is intended to provide overall guidance for the reporting of concerns and to further encourage and enable stakeholders to raise concerns within Cricket South Africa rather than overlooking the problem or reporting such concerns through inappropriate channels.

5.2 Furthermore, this Whistle Blowing Policy aims to:

- a) Highlight the various channels available to stakeholders of Cricket South Africa to raise concerns and receive feedback on matters reported and any action taken by management in addressing the matters reported;
- b) Reassure stakeholders that they will be protected from reprisals or victimisation for disclosures made in good faith.

5.3 This policy is intended to address concerns that fall outside the scope of grievance procedures, which, although not exhaustive, include the following:

- a) Conduct which is an offence or a breach of law;
- b) Disclosures related to miscarriages of justice ;
- c) Health and safety risks, including risks to the public as well as other employees;
- d) Damage to the environment;
- e) Discrimination (including but not limited to racial and gender)
- f) The unauthorised use of company resources;
- g) Possible fraud and corruption;
- h) Sexual or physical abuse including that of children;
- i) Other unethical conduct;
- j) Serious failure to comply with appropriate professional standards;
- k) Abuse of power, or use of company powers and authority for any unauthorised use or personal gain;
- l) Deliberate breach of company policies and/or procedures.

## 6. **Applicability**

This policy applies to all of CSA's stakeholders.

## 7. **Policy Information**

### 7.1 **Acting in Good Faith**

Users of the Cricket South Africa whistleblowing line must act in good faith and must not make false accusations when reporting any concerns. Good faith is when a disclosure is made without malice or consideration of personal benefit and the complainant has a reasonable basis to believe the report to be true. Any employee who knowingly or recklessly makes false or misleading statements or disclosures that are not in good faith may be subject to disciplinary action following which the maximum sanction will be applied to the employee.

## 7.2 Reporting Channels

7.2.1 In order to remain in compliance with the Protected Disclosures Act, Cricket South Africa will:

- a) Ensure protection of stakeholders who submit a disclosure in good faith, using the appropriate channels provided by Cricket South Africa.

7.2.2 Concerns may be raised verbally or in writing. Stakeholders who wish to make a written report are invited to use the following format:

- a) The background and history of the concern (giving relevant dates);
- b) The reason you are particularly concerned about the situation;
- c) The extent to which you have personally witnessed or experienced the problem (provide documented evidence where possible).

Although you are not expected to prove beyond reasonable doubt the validity of an allegation, you will need to demonstrate to the person contacted that there are reasonable grounds for your concern.

## 7.3. Safeguards – Harassment and Victimisation

Cricket South Africa is committed to good practice and high standards and wants to be supportive of stakeholders.

Cricket South Africa recognises that the decision to report a matter can be a difficult one to make and is therefore committed to ensuring that everyone is protected for a disclosure made in good faith.

Retaliation by any employee of CSA, directly or indirectly, against any person who, in good faith, submits a disclosure or provides assistance to those responsible for investigating the allegations will not be tolerated.

No employee will suffer harassment, retaliation or adverse employment consequences as a result of the submission in good faith of their disclosure. Any CSA employee, who retaliates against a person who has submitted a disclosure pursuant to this policy in good faith, shall be subject to disciplinary action following which the maximum sanction will be applied.

## 7.4 Definition of a Disclosure

A disclosure is a reported concern that has been submitted by an employee, contractor or external stakeholder acting in good faith using the Cricket South Africa anonymous whistleblowing line. It does not include issues or concerns raised by employees/stakeholders through normal business channels in an open, non-confidential manner. All disclosure reports will be treated in confidence.

To enhance the confidentiality of the system, Cricket South Africa has chosen to outsource the management of the Cricket South Africa anonymous whistleblowing line and has selected and contracted an independent specialist external provider (link found on the CSA website). Disclosures will be handled in a secure environment by external service provider’s professionally trained personnel.

**8. Reporting and Recording of Disclosures**

Users of the Cricket South Africa whistleblowing line can report their disclosures using any one of the following mediums of communications:

Email: [cricketsa@tip-offs.com](mailto:cricketsa@tip-offs.com) Toll-Free: 08000 00 536  
 Free Post: Tip-offs Anonymous, Free Post KZN 138,  
 Umhlanga Rocks, 4320  
 Free Fax: 0800 00 77 88  
 Website: [www.tip-offs.com](http://www.tip-offs.com)

**9. How will the Company Respond**

The Response Plan deals with how Cricket South Africa will address or respond to matters reported whether through internal reporting mechanisms or through the Cricket South Africa whistleblowing line, which is outlined below:

- 9.1 Cricket South Africa will respond to all disclosures made.
- 9.2 Cricket South Africa will ensure the stakeholder protection if the disclosure made is in good faith. Fictitious reporting is a disciplinary offence. The Protected Disclosures Act provides for fines and imprisonment for the offence of fictitious reporting with malicious intent.
  - 9.2.1 In order to protect individuals and those accused of misdeeds or possible malpractice, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take.
- 9.3 Where an investigation is appropriate, the matters raised will either:
  - 9.3.1 Be investigated internally by Compliance, internal audit, or through the disciplinary process, or
  - 9.3.2 All member affiliate reports will be submitted to the Affiliate Boards for investigation with the exception of material allegations that include but not limited to Affiliate Board Members. CSA may exercise the “Administrative and Financial Affairs” MOI clause that provides for the CSA Board’s entitlement to enquire into the administrative and/or financial affairs of Affiliate Members, Associates and Ancillaries.



- 9.3.3 Be referred to an independent outside service provider with the necessary specialist expertise and experience in dealing with the type of disclosure made. This will be reviewed on a case-by-case basis.
- 9.4 Some concerns may be resolved by agreed action without the need for formal investigations. If urgent action is required this will be taken before any investigations are conducted.
- 9.5 The investigation and the duration thereof will depend on the nature of the matters raised, the difficulties involved and the clarity of the information provided. If necessary, further information may be sought from the individual making the disclosure.
- 9.6 The investigations will be handled in a confidential manner and will not be disclosed or discussed with any persons other than those with a legitimate right to such information. Appropriate feedback will be provided upon request, to the whistle blower.

## 10. The Responsible Officer

The Compliance Department has overall responsibility for the maintenance and implementation of this policy. The Department maintains a record of concerns and the outcomes (but in a form which does not compromise confidentiality) and will report as necessary to the CEO, Audit, Governance and Risk Committee and Social and Ethics Committee.

## 11. Creating Awareness

In order for the Policy to be sustainable, it will be supported by a structured education, communication and awareness programme as part of Cricket South Africa's broader fraud risk management strategy.

## 12. Non-Compliance/Consequence management

Employees who do not conform to this policy will be subject to disciplinary action in terms of the applicable CSA disciplinary processes and procedures.