

TOYOTA ZAMBIA WHISTLE BLOWING POLICY

INTRODUCTION

The following procedures have been adopted by the TZAM Management Team to govern the receipt, retention and treatment of complaints and to protect the confidential and anonymous reporting of the same. These policies and procedures are available to all employees of the Company and external stakeholders.

SCOPE

The policy cover all employees of Toyota Zambia Limited and external stakeholders.

RESPONSIBILITY AND OWNERSHIP

The Company will endeavour to ensure that appropriate prevention and detection controls are applied, however it is the responsibility of Employees and the Managers to report all incidents of fraud, corruption, theft, maladministration or any other dishonest activities.

The Company will take appropriate legal recourse to recover losses or damages arising from fraud, corruption, theft or maladministration.

In view of the legal framework and the Company's policy, any Employee who shows disregard to the Company's policy will be dealt with in terms of the Company's disciplinary procedure.

Policy

Employees have the opportunity to submit/report complaints pertaining to the following areas such as:-

- Providing information to the Risk and Assurance Manager or Management which leads to the prevention of theft and recovery of stolen assets

- Violating of any rules and regulations applicable to the Company and related to Accounting, Internal Accounting and controls and auditing matters
- Intentional error or fraud in the preparation , review or audit of any financial statements of the Company
- Any violation to the Company's ethical business practices as specified in TZAM's Staff Manual Policies
- Any other event , which would affect the interests of the business
- Corruption, criminal activities etc
- A reward will be paid to informant and will be authorized by the Managing Director subject to a scale of 10% of the value of the subject matter recovered to the maximum of \$1000.

Toyota Zambia will protect the confidentiality and anonymity of the Complainant to the fullest extent possible with an objective to conduct a review. External Stakeholders such as vendors, customers, business partners etc have the opportunity to submit complaints; however the Company is not obligated to keep the complaints from non employees confidential but will maintain the anonymity of non employees. However, individuals are encouraged to send complaints/raising any matter by identifying themselves as it will assist in the complaints review process.

Receipts and Treatment of Complaints

- (a) The Risk and Assurance Manager is the primary receipt of all Whistle-Blower incidents
- (b) Complaints reported are investigated by the Risk Management Team
- (c) The person/persons against or in relation to whom the Complaint is made shall cooperate with the investigator and have the right to provide their inputs during investigations.
- (d) The Risk and Assurance Committee shall comprise the Managing Director, National HR Manager, Finance Manager and the Risk and Assurance Manager.
- (e) The Risk and Assurance Committee shall meet every so often when necessary to consider any issues that may arise.

Access to Reports and Records and Disclosure of Investigation Results

All reports and records associated with Complaints are considered confidential information and access shall be restricted to Risk and Assurance Manager and the Risk and Assurance Committee. Reports or resulting actions will generally not be disclosed to the public except as required by any legal requirements or regulations or any corporate policy in place at that time.

Retention of Records

All documents relating to such Complaints made through the procedures outlined above shall be retained for at least six years from the date of the complaint after which the information may be destroyed unless the information may be relevant to any pending or potential litigation, inquiry or investigation in which case the information shall be retained for the duration of that litigation, inquiry or investigation as deemed necessary.

Caution

Managers should discourage employees and officials from making allegations which are false and made with malicious intentions. Where such malicious or false allegations are discovered, the person who made the allegations must be subjected to firm disciplinary action as outline in the Toyota Zambia Staff Manual.