<table>
<tr><td>Policy Owner</td><td colspan="3">Legal Practice Council</td></tr>
<tr><td>Effective date</td><td colspan="3">15 June 2026</td></tr>
<tr><td>Last Review date</td><td colspan="3">1 May 2026</td></tr>
<tr><td>Next Review date</td><td colspan="3">30 April 2029</td></tr>
<tr><td rowspan="4">Authorized by</td><td rowspan="2">Chairperson</td><td></td><td></td></tr>
<tr><td>Signature</td><td>Date</td></tr>
<tr><td rowspan="2">Executive Officer</td><td></td><td></td></tr>
<tr><td>Signature</td><td>Date</td></tr>
<tr><td>Note</td><td colspan="3">Legal Practice Council (the Council) reserves the right to amend this policy as and when required. The policy currently in effect will apply to all Council Members, employees and service providers.</td></tr>
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1. PURPOSE

1.1. The Legal Practice Council (LPC) is committed to fostering a culture of integrity, transparency, accountability, and ethical conduct.

1.2. This policy establishes a structured and secure framework that enables employees, stakeholders, and members of the public to report suspected misconduct, irregularities, or unlawful activities without fear of retaliation.

1.3. The objective of this policy is to:

a. Promote a speak-up culture where concerns can be raised safely.
b. Ensure disclosures are handled promptly, fairly, and confidentially
c. Provide protection to whistleblowers in line with applicable legislation
d. Enable the LPC to detect, investigate, and address misconduct effectively

2. SCOPE

2.1. This policy applies to all LPC employees (permanent, temporary, interns), Council and Committee Members, independent contractors, service providers, Legal Practitioners, Candidate Legal Practitioners, members of the public and any stakeholder interacting with the LPC.

2.2. This policy does not extend to personal employment grievances, which are to be addressed in accordance with the applicable Human Resources procedure.

3. DEFINITIONS

Term	Description
Bad Faith	It is when a disclosure is made recklessly, with malice and with the intention to deceive or mislead another to gain some benefit.
Disclosure	A disclosure is a reported concern that has been submitted by an employee, contractor or any other stakeholder acting in good faith using the available reporting channels.
Good Faith	It 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.

<table>
<tr><th>Term</th><th>Description</th></tr>
<tr><td>Whistleblower</td><td>means a person (employees, relevant stakeholders and members of public in general) who has made a disclosure in terms of this policy.</td></tr>
<tr><td>Occupational Detriment</td><td>In relation to the working environment of an employee occupational detriment means:
a. Being subjected to any disciplinary action;
b. Being dismissed, suspended, demoted, harassed or intimidated;
c. Being transferred against his or her will;
d. Being refused transfer or promotion;
e. Being subjected to a term or condition of employment or retirement which is altered or kept altered to his or her disadvantage;
f. Retirement which is altered or kept altered to his or her disadvantage;
g. Being refused a reference, or being provided with an adverse reference, from his or her employer;
h. Being subjected to any civil claim for the alleged breach of a duty of confidentiality or a confidentiality agreement arising out of the disclosure of:
    a. A criminal offence; or
    b. Information which shows or tends to show that a substantial contravention of, or failure to comply with the law has occurred, is occurring or is likely to occur;
i. Being denied appointment to any employment, profession or office;
j. Being threatened with any of the actions referred to above; or
k. Being otherwise adversely affected in respect of his or her employment, profession or office, including employment opportunities and work security and the retention or acquisition of contracts to perform work or render services</td></tr>
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4. LEGISLATIVE FRAMEWORK

4.1. This policy is aligned with:

a. The Constitution of the Republic of South Africa, 1996
b. Legal Practice Act, No. 28 of 2014
c. Protected Disclosures Act 26 of 2000, as amended by: Protected Disclosures Amendment Act 5 of 2017; and Judicial Matters Amendment Act 15 of 2023.
d. Labour Relations Act, No. 66 of 1995
e. Promotion of Equality and Prevention of Unfair Discrimination Act, No.4 of 2000.
f. Prevention and Combating of Corrupt Activities Act, No. 12 of 2004
g. Protection from Harassment Act 17 of 2011
h. King V Report on Corporate Governance

5. POLICY STATEMENT

5.1. The LPC adopts a zero-tolerance approach to misconduct and is committed to:

a. Promote ethical culture by training and informing employees about the events which constitute improprieties and the effect they have
b. Encourage the reporting of wrongdoing
c. Treat all disclosures seriously impartially and confidential
d. Protect whistleblowers from occupational detriment
e. Ensure anonymity were requested
f. Conduct investigation into any allegations of improprieties, particularly fraud and corruption
g. Take appropriate disciplinary, civil, or criminal action where necessary

6. REPORTABLE CONCERNS

6.1. Disclosures may relate to, but are not limited to:

a. Fraud, corruption, or financial misconduct

b. Criminal offences
c. Theft
d. Bribery
e. Failure to comply with legal or regulatory obligations
f. Abuse of power or authority
g. Harassment or discrimination
h. Health, safety, or environmental risks
i. Deliberate concealment of any of the above

7. REPORTING CHANNELS

7.1. The prescribed reporting platforms are intended to create a culture which encourages disclosure of information relating to unethical, irregular conduct and criminal in the LPC.

7.2. The reporting of such must be done in good faith and responsible manner. Whistleblowers must be protected against intimidation and/or victimization for reporting in good faith.

7.3. LPC encourages whistleblowers to report concerns to the following Toll-free number or email address managed by an independent service provider. Trustline Toll-Free: 0800 20 2036 and/or Email: trustline@tip-offs.com.

7.4. Alternatively, disclosures may also be made to the following officials:
a. National Council Members
b. Executive Officer
c. Manager Risk and Compliance (National Office)
d. External authorities (e.g., Public Protector, SAPS, Legal Services Ombud etc)

8. INFORMATION REQUIRED FOR DISCLOSURE

8.1. To enable effective investigation, whistleblowers are encouraged to provide comprehensive information such as the names of the alleged involved parties, date/s, location, background and history of the concern, key facts, and the extent to which you have personally witnessed or experienced the problem (provide documented evidence where possible).

8.2. Whistleblowers shall not be expected to prove beyond reasonable doubt the truth of an allegation but shall need to demonstrate to the person contacted that there are reasonable grounds for the concern.

9. CONFIDENTIALITY AND ANONYMITY

9.1. The LPC commits to protect the identity of whistleblowers, ensure all reports are handled, processed and stored in a confidential and secure manner.

9.2. Disclosure of identity will only occur where required by law or where necessary for investigation purposes, and measures will be put in place to protect whistleblowers.

10. PROTECTION OF WHISTLEBLOWERS

10.1. Whistleblowers shall be protected against any form of occupational negative treatment, including dismissal, harassment, intimidation, or discrimination.

10.2. In line with the Protected Disclosures Amendment Act, whistleblowers must be protected from civil and criminal liability arising from a protected disclosure and will not be subjected to disciplinary action for making a protected disclosure.

10.3. Any person who retaliates against a whistleblower will be subject to disciplinary action.

11. FALSE OR MALICIOUS DISCLOSURES

10.4. Disclosures must be made in good faith; false or malicious disclosure amounts to an offence.

10.5. Any employee that reports in bad faith shall be subjected to consequence management for the disclosure. This may entail disciplinary action against employees and termination of contractual relationship with the stakeholder.

10.6. Furthermore, civil and criminal litigation for defamation and/or crimen injuria. In addition, the fact that a person has made a disclosure does not give that person immunity from organizational policies or criminal prosecution if the person making the disclosure has also been involved in the wrongdoing.

12. PROCESS OF HANDLING DISCLOSURES

12.1. Acknowledgement

12.1.1. All disclosures must be acknowledged in writing within 21 days of receipt (where contact details are available).

12.1.2. Received information shall be logged and registered on the LPC Whistleblowing Register where applicable.

12.1.3. The register shall be consolidated by Manager Risk and Compliance (National Office), and the Executive Officer shall provide oversight to ensure distribution to relevant role players for assessment and investigation.

12.2. Assessment and Investigation

12.2.1. Disclosures shall be assessed and, where necessary, investigated.

12.2.2. The investigations may be conducted internally or by an independent external party as directed by the EO.

12.2.3. Where applicable referrals to law enforcement, criminal and civil proceedings as well as employee disciplinary management shall be initiated accordingly.

12.2.4. Where the internal investigation of an allegation is likely to compromise the quality, integrity or confidentiality of the investigation, the investigation may be outsourced to an external service provider.

12.3. Feedback

12.3.1. Appropriate feedback shall be provided upon request, by the whistleblower.

12.3.2. Information pertaining to the status of reported cases versus resolved cases shall be communicated to EXCO, Risk and Compliance Committee, Finance & HR Committee and ultimately to Council.

13. ACCOUNTABILITY AND RESPONSIBILITIES

The overall accountability for development and implementation of this policy lies with the Executive Officer with the support from National Office Risk and Compliance Manager, Senior Manager Human Resources and Senior Manager Regulatory.

RESPONSIBLE	ACCOUNTABLE	CONSULTED	INFORMED
Senior Manager HR, Senior Manager Regulatory and Manager Risk and Compliance (National Office).	Executive Officer	Provincial Directors and Senior Management	LPC employees
Has overall responsibility for implementation and adherence of this procedure	Has overall accountability for development and implementation of this policy	Consulted at the time of drafting this policy	Has overall responsibility for adherence.

14. POLICY REVIEW

This policy will be reviewed every (3) three years or as required to ensure ongoing effectiveness and compliance.

15. POLICY APPROVAL

This policy is approved by the Council and becomes effective on the date of signature.