FOUR NOMADS

GOVERNANCE

Whistleblower Policy

How to raise a concern about serious wrongdoing at Four Nomads, what we will do with it, and the protection the law gives you for speaking up.

Issued under the **Protected Disclosures Act 26 of 2000**, as amended by the Protected Disclosures Amendment Act 5 of 2017, read with the **Companies Act 71 of 2008** and the **Prevention and Combating of Corrupt Activities Act 12 of 2004**.

ORGANISATION	Four Nomads NPC, a non-profit company incorporated in the Republic of South Africa
REGISTRATION NUMBER	2022/514801/08 (Companies and Intellectual Property Commission)
REGISTERED OFFICE	51 Boabab Street, Newtown, Louis Trichardt, 0920
DOCUMENT REFERENCE	FN-WHISTLE-01
VERSION	1.0
DATE OF ISSUE	October 2026
NEXT SCHEDULED REVIEW	October 2027

Contents

1 The point of this policy
2 What to report
3 How to raise it
4 What we do with it
5 Protection against retaliation
6 Going outside Four Nomads
7 Records and oversight
8 Document control and approval

1 The point of this policy

Most serious wrongdoing in an organisation is noticed by somebody long before it is discovered by anybody official. Whether it gets dealt with usually comes down to one question: did that person feel safe enough to say something?

This policy is Four Nomads' answer. It tells you how to raise a concern, promises what we will do with it, and sets out the protection the Protected Disclosures Act gives you. It applies to everyone — including people outside the organisation, such as a teacher at a partner school or a parent.

A CONCERN ABOUT A CHILD DOES NOT WAIT FOR THIS POLICY

If a child is at risk, go straight to the Child Safeguarding and Protection Policy. Immediate danger: **10111**, or **112** from a mobile. A sexual offence against a child must be reported to a police official immediately, by you, under section 54(1) of the Sexual Offences Act 32 of 2007 — that duty is personal and nothing in this policy postpones it.

2 What to report

Raise a concern where you have a reasonable belief that any of the following has happened, is happening, or is likely to happen:

- theft, fraud, or the misuse of donor or programme funds;
- a bribe offered or accepted, or any other corrupt activity;
- a false Section 18A receipt, or false reporting to a funder, SARS, the CIPC or the Information Regulator;
- an undeclared conflict of interest, or a contract steered to a related party;
- harm or risk of harm to a learner, or a breach of the Safeguarding Policy;
- a serious breach of personal information, or its deliberate misuse;
- a failure to comply with a legal obligation;
- a danger to the health or safety of any person;
- unfair discrimination, harassment or abuse of authority;
- the deliberate concealment of any of the above.

You do not need proof, and you do not need to be right. You need an honest, reasonable belief. Establishing the facts is our job, not yours.

This is not the route for a personal grievance about your own treatment — pay, workload, a disagreement with a colleague. Those go to your Four Nomads contact or to the Board. If you are unsure which it is, raise it here anyway and we will route it.

3 How to raise it

ROUTE	CONTACT	WHEN TO USE IT
1 · Your Four Nomads contact	Whoever you report to	Ordinary concerns, where the person is not involved.
2 · The Information Officer	Ndivho Ramovha · ndivho@fournomads.org	Information, records, privacy, or where route 1 is not appropriate.
3 · The Designated Safeguarding Lead	ndivho@fournomads.org, subject "Safeguarding — urgent"	Anything concerning a child.
4 · The Board of Directors	Ndivho Ramovha · Risuna Harriot Maluleke · Darrel Landsberg · Kalizya Silungwe	Where the concern involves the Information Officer, a director, or where an earlier route produced nothing.
5 · Outside Four Nomads	See section 6	Where internal routes are unsafe, exhausted or inappropriate.

Put it in writing if you can — what happened, when, who was involved, what you saw or were told, and whether anyone else knows. If writing is difficult, ask to speak to someone and they will write it down with you and give you a copy to check.

3.1 Anonymous reports

You may report anonymously and we will investigate as far as we can. Be aware that anonymity cuts both ways: we cannot come back to you for detail, we cannot keep you informed, and we cannot extend the practical protections in section 5 to somebody we cannot identify. A named report handled confidentially is almost always better. The Protected Disclosures Act protects a disclosure made in the manner it describes; an anonymous disclosure may fall outside that protection.

4 What we do with it

1. **Acknowledge** within **5 working days**, with a reference and the name of the person handling it.
2. **Assess** within **10 working days** — is it within this policy, how serious is it, is it urgent, and must it be reported to an authority immediately.
3. **Secure** the relevant records under a legal hold, so that nothing can be destroyed.
4. **Investigate** through somebody with **no connection to the matter**. Where the concern touches a director, an independent outside investigator is appointed. Where it concerns a criminal offence, it is reported to the police and we do not run our own investigation in parallel in a way that could prejudice theirs.
5. **Report** to the Board, which records the matter and the outcome in its minutes. Serious matters are disclosed to the auditors and, where a funding agreement requires it, to the funder.
6. **Tell you** the outcome in general terms, and what has changed as a result — unless the law or another person's rights prevent it. Four Nomads aims to conclude a matter within **60 days** and will tell you if it will take longer.

Confidentiality is maintained as far as the investigation and the law allow. If your identity may have to be disclosed — because the matter goes to court, or because it cannot be investigated otherwise — we tell you before it happens and discuss it with you.

5 Protection against retaliation

Four Nomads will not tolerate any detriment to a person who raises a concern in good faith. That covers dismissal, the ending of a volunteer placement, demotion, exclusion from work or a programme, the withdrawal of a reference, harassment, isolation, or any threat of these.

Retaliation is itself a disciplinary offence and will be treated as seriously as the original wrongdoing. If you believe you are being treated badly because you spoke up, report that **directly to the Board**, and it will be dealt with as a matter in its own right.

5.1 The Protected Disclosures Act

The Protected Disclosures Act 26 of 2000, as amended in 2017, makes it unlawful to subject an employee or worker to an **occupational detriment** for making a **protected disclosure**. The 2017 amendment extended the protection beyond employees to a wider class of workers, including independent contractors, consultants and agents, and created an offence of making a disclosure knowing it to be false. The Act also obliges an employer who receives a disclosure to respond to the person within a prescribed period.

We draw this to your attention for one reason: the protection is given by law, not by this policy, and nothing Four Nomads does or says can take it away.

5.2 Where the protection does not reach

A disclosure made **knowing it to be false**, or for personal advantage, is not protected, is an offence under the amended Act, and is a disciplinary matter here. Being **wrong** is not the same as being dishonest: a concern raised honestly and in good faith that turns out to be unfounded attracts no consequence whatsoever, and we would rather receive ten of those than miss one real problem.

6 Going outside Four Nomads

You are entitled to go outside the organisation, and should do so without hesitation where a child is at risk, where a crime has been committed, or where you reasonably believe raising it internally would lead to evidence being destroyed or to retaliation.

A CHILD AT RISK	South African Police Service — 10111, or 112 from a mobile · Childline 116 · the provincial Department of Social Development
A SEXUAL OFFENCE AGAINST A CHILD	A police official, immediately — mandatory under section 54(1) of Act 32 of 2007
CRIME, FRAUD OR CORRUPTION	South African Police Service · the Directorate for Priority Crime Investigation
CORRUPTION, MALADMINISTRATION	The Public Protector — 0800 11 20 40
TAX AND SECTION 18A MATTERS	The South African Revenue Service
COMPANY LAW AND DIRECTORS' CONDUCT	The Companies and Intellectual Property Commission
PERSONAL INFORMATION	The Information Regulator (South Africa) — enquiries@inforegulator.org.za
EMPLOYMENT DETRIMENT	The CCMA, or the Labour Court

Four Nomads will not take action against anyone for making a disclosure to any of these bodies, and no agreement with Four Nomads — including the Confidentiality Undertaking — prevents it. Any contract term that purported to do so would be unenforceable.

7 Records and oversight

A confidential register of disclosures is kept by the Chairperson of the Board, recording the date, the nature of the concern, the action taken and the outcome, but no more identifying detail than necessary. It is reviewed by the Board annually and is available to the auditors.

The Board reports annually on the number of disclosures received and how they were resolved. Everyone is made aware of this policy on induction and annually thereafter, and it is published on our website so that a parent, a teacher or a member of the public can use it.

8 Document control and approval

VERSION	DATE	AUTHOR	CHANGE
1.0	October 2026	Information Officer	First issue.

OWNER	The Board of Directors, Four Nomads NPC
APPROVED BY	The Board of Directors of Four Nomads NPC
BOARD RESOLUTION DATE	12 September 2026
NEXT REVIEW	October 2027
APPLIES TO	Every director, employee, volunteer, mentor, intern, contractor, partner school, funder and member of the public
RELATED DOCUMENTS	FN-SAFE-01 Child Safeguarding and Protection Policy · FN-COI-01 Conflict of Interest Policy · FN-BOARD-01 Board Charter

Darrel Landsberg

CHAIRPERSON OF THE BOARD
Darrel Landsberg

FOR THE BOARD OF DIRECTORS
Ndivho Ramovha (Vice-Chairperson)

12/10/2026

DATE

Four Nomads NPC · Registration No. 2022/514801/08 · PBO No. 930086019 · Section 18A approved
51 Boabab Street, Newtown, Louis Trichardt, 0920 · 17 Kolgans Street, The Reeds, Centurion, 0061
info@fournomads.org · ndivho@fournomads.org · +27 (0)81 248 9372

This document states the position as at the date of issue. It is an internal governance and compliance document prepared for Four Nomads NPC and is not legal advice to any other person. Where it conflicts with legislation, the legislation governs.