



TOBACCO INDUSTRY AND MARKETING BOARD
WHISTLE-BLOWER
POLICY AND PROCEDURE MANUAL

July 2022

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Definitions

In this Policy and Procedure Manual –

Act	Tobacco Industry and Marketing Act [Chapter 24:25]
TIMB	Tobacco Industry and Marketing Board
Confidential information	Any information that is by its nature confidential or sensitive and / or not generally available to the public including information about the identity, rank, position or other personal details of a whistle-blower, a person against whom a whistle-blower has reported on, information disclosed by a whistle-blower, information that, if disclosed, may cause detriment to any person.
External stakeholder	Any person (other than TIMB employees and Directors) who has an interest or is involved in activities under TIMB's regulatory ambit.
Misconduct	Any conduct of which if proven constitutes a violation of the TIMB laws rendering a disciplinary or criminal offence.
Policy	TIMB's Whistle-blower Policy and Procedure Manual
Qualifying disclosure	Reports of misconduct made in accordance with the requirements of this Policy and qualify for protection under the relevant legislation.
Reported person	A person who is alleged to have breached any of the TIMB laws and regulations and committed any unethical conduct.
Report of misconduct	The report submitted by the whistle-blower to TIMB regarding an infringement of the tobacco industry laws
Whistle-blow	Deliberate and voluntary reporting of individual or organisational malpractice by a person who has or had privileged access to data, events or information about an actual or suspected misconduct within the tobacco industry by another person.
Whistle-blower	Any stakeholder with knowledge of a misconduct who reports such misconduct to TIMB in terms of this Policy

List of Abbreviations

Act	Tobacco Industry and Marketing Act Chapter [18:20]
CEO	The Chief Executive Officer of TIMB
Inspectorate	Inspectorate department of TIMB
Regulations	Tobacco Industry and Marketing (Prohibition of Side Marketing) General, Regulations
TIMB	Tobacco Industry and Marketing Board
BUYERS	Tobacco merchants (includes all TIMB licensed/registered entities as defined in the Act)

1. Background

The TIMB is mandated to control and regulate the marketing of tobacco and to promote, protect and maintain the sale of tobacco. As such, TIMB has realised the need to create an environment that fosters an open and transparent culture of ethical practice and accountability. This comes after recognising the need to identify and address misconduct at an early stage. TIMB values support from persons with privileged information that can aid the Board's regulatory efforts in combating market malpractice. Whistle-blowers play an important role in identifying and calling out misconduct and harm to the tobacco industry. This Policy is therefore intended to foster an environment where eligible whistle-blowers can report on misconduct within the tobacco industry without fear.

TIMB encourages disclosure of any suspected or actual misconduct and undertake to treat all such disclosures seriously and confidentially. TIMB commits to investigate all qualifying disclosures promptly and thoroughly. Through this policy, the Board provides formal channels for external stakeholders to speak up about violation of the tobacco laws. TIMB believes that this policy is fundamental for good corporate governance and ethical business practices and complements the Public Entities and Corporate Governance Act [Chapter 10:31].

2. Purpose

Taking cognizance of the Board's commitment in preventing and combating market malpractice, the main purpose of this manual is to –

- i. Provide an early warning system to remedy misconduct before serious damage is caused.
- ii. Provide a formal channel to enable whistle-blowers to report actual and suspected malpractices in good faith without fear
- iii. Reassure whistle-blowers of their right to protection from any form of reprisal

3. Objectives

This Whistle-blower Policy and Procedure Manual aims to:

- Minimize harm market players by proactively holding accountable those responsible for unlawful conduct.
- Set out the manner in which TIMB manages reports of misconduct
- Foster good corporate governance, ethical behaviour and compliance within the tobacco industry laws.
- Contribute towards TIMB's effective execution of its mandate of maintaining high levels of investor protection and market integrity.

The Policy is accessible from the Board's website for reference by all external stakeholders.

4. Scope of the Policy

This Policy discusses the following key areas:

- Application of the Policy

- Eligibility to whistle-blow
- Qualifying disclosure
- Matters classified as misconduct
- Exclusions
- Eligible recipients
- Reporting
- Investigation Procedure
- Protection
- Compensation and other remedies
- Breach of the Policy
- Enforcement action by TIMB
- Ownership and oversight of the Policy

5. Application

The Policy applies to reports of misconduct against any suspected or actual misconduct within an area of TIMB regulatory ambit. The Policy therefore covers all reports made against any person who has or is alleged to have committed a misconduct within the tobacco industry. Such reports are made by any eligible whistle-blower.

5.1 Eligible Whistle-blowers

A whistle-blower can be an individual, or a group of individuals acting in concert, who:

- has or have witnessed or is or are aware of, or suspect a violation of the tobacco industry law, by an individual or a firm that is involved in the tobacco industry; and
- voluntarily report that information to the Board.

Eligible whistle-blowers therefore include the following:

- i. Employees of TIMB
- ii. employees of contractors working for TIMB, for example, cleaners, security personnel, builders and caterers
- iii. employees of suppliers
- iv. those providing services under a contract or other agreement with TIMB
- v. any members of the public

and have knowledge of an actual or potential misconduct by any reported person. Final determination of a whistle-blower's eligibility shall be made by the Board in terms of the Act.

5.2 Qualifying Disclosure

To qualify for disclosure:

- A whistle-blower must have information about a contravention of the tobacco industry laws by the reported person.

- A whistle-blower must seek to voluntarily disclose this information to TIMB
- The information provided must not be misleading or untrue, is original information that contains timely, specific and credible facts about tobacco law violation

A report of misconduct is a disclosable matter under this policy if the whistle-blower:

- has previously reported the matter internally but still not satisfied with the response given on the matter or
- feels unable to raise the matter with an immediate supervisor, either because the supervisor is the subject of the matter or
- believes that the supervisor is unlikely to deal with the disclosure properly.

5.3 Misconduct

A report of misconduct will qualify for protection under this policy if the whistle-blower has reasonable grounds to suspect that the disclosed information concerns misconduct, improper state of affairs or circumstances including:

- Breach of any applicable tobacco industry law, rule, regulation, policy and procedure
- Any action with or likely to have negative financial repercussions / losses / costs to TIMB and any company
- Any action that has or is likely to endanger the industry at large.
- Any criminal act as defined by applicable tobacco industry laws, breach of ethics as described in applicable code of ethics, corporate governance and or any corrupt behaviour, bribery, financial impropriety including fraud, money laundering or misappropriation of funds
- Unregistered / unlicensed/unlawful tobacco industry activity
- Reprisal of any form.
- A deliberate concealment of information relating to any of the above
- Any other conduct which may be otherwise detrimental to the interests or reputation of the tobacco industry, or any of its employees whether or not it involves a contravention of law.

A whistle-blower may still qualify for protection under this policy even if the Qualifying Disclosure turns out to be incorrect.

5.4 Exclusions

This policy does not apply to matters relating to non-Qualifying Disclosures, including issues relating to:

- poor performance of job duties; or
- personal work-related grievances.

Employees work and performance-related grievances may be directly reported to departmental managers or human resources in accordance with the relevant employee grievance policy. For the avoidance of doubt, a personal work-related grievance may still be a Qualifying Disclosure if:

- it includes information about misconduct, or information about misconduct includes or is accompanied by a personal work-related grievance
- the Whistle-blower suffers from or is threatened with detriment for disclosing the matter.

5.5 Eligible Recipients

Eligible recipients can be internal (i.e within the licensed or registered entity for which the whistle-blower works), relevant TIMB officials.

5.5.1 Internal

The Board encourages whistle-blowers who are employees of Buyers to report actual or potential violations of the tobacco industry laws in the workplace to their immediate supervisors in accordance with their employer's internal compliance and reporting mechanisms. Concerned reporting persons may make reports to Deloitte or other external authorities under the following circumstances:

- The use of internal mechanism is not possible because at the time of reporting, the employee has grounds to believe that he/she would be subjected to retaliation by the officials he or she should report pursuant to the established internal mechanism or
- Instance of potential or actual concealment or destruction of evidence relating to the misconduct.

5.5.2 Reporting and Recording of Disclosures through Deloitte Tip-offs Anonymous

Whistleblowers can report their disclosures using any one of the following mediums of communications:

- **Toll Free Econet lines:** 0808 5500/ 4461
- **Toll Free Netone lines:** 0716 800 189/ 0716 800 190
- **Toll Free Telecel lines:** 0732 220 220/ 0732 330 330
- **WhatsApp Number:** 0772 161 630
- **Free Post:** The Call Centre, P O Box, HG883, Highlands, Harare.
- **E-mail** : reportszw@tip-offs.com
- **Website** : <http://www.tip-offs.com>

If any report is against the CEO, report is automatically submitted to escalation level 3.

Disclosures will be received by Deloitte Tip-offs Anonymous, the external service provider and reports will be prepared for communication to the following authorised individuals listed in the table below:

Station	Designation
<u>Integrity Committee</u>	
<u>Escalation Level 1</u>	Inspectorate department or the Internal Auditors
<u>Escalation Level 2</u>	Chief Executive Officer or the Chief Operating Officer
<u>Escalation Level 3</u>	TIMB Chairman or the Audit Committee Chairperson

Under normal circumstances, all reports will be sent to the Integrity Committee as the primary recipients.

However, a relevant escalation process has also been defined for certain circumstances as follows:

- Should any member of the Integrity Committee be implicated, the report is escalated to Escalation Level 1.
- Should any recipient at Escalation Level 1 be implicated, the report is escalated to Escalation Level 2.

The reports will include only objectively presented information that is in direct relation to the scope of any investigation undertaken for the verification of the alleged facts.

All reports provided to the reporting personnel as indicated above will eliminate any element that could identify the employee making a disclosure. This means that the employee will remain totally anonymous if they have chosen to use this option.

However, the identity of an employee will only be provided to TIMB if the following condition is met:

- The employee has given their verbal or written consent to Deloitte Tip-offs Anonymous, the external service provider, to communicate their identity to TIMB.

5.6 Reporting

A false report of a matter could have significant effects on TIMB reputation and the industry at large. Deliberate false reports involve a whistle-blower reporting information they know is untrue. It does not include situations where a whistle-blower has reasonable grounds to suspect misconduct, but his / her suspicions are later (for example after an investigation) determined to be unfounded. Any deliberately false reporting of a matter, whether under this policy or otherwise, will attract disciplinary action.

5.6.1 Requirements for Good Faith

An allegation of misconduct may result in serious personal repercussions for the person who has allegedly committed the misconduct. To help preserve the integrity of this policy and its implementation, whistle-blowers should:

- a) ensure that disclosure of the matter is made in good faith
- b) ensure that, insofar as reasonably possible, they provide specific, adequate and pertinent information relating to the matter, including dates, places, names of persons and witnesses, amounts and other relevant information
- c) have reasonable and probable grounds for the best interest of the market and not personal gain and
- d) not discuss the matter with any person other than the Eligible Recipient.

The element of good faith shall be deemed to be lacking:

- a) when the person does not have personal knowledge or a factual basis for the reported person's misconduct
- b) where the person knew or reasonably should have known that the report or any of its contents are false or
- c) when there are any other circumstances that indicate that the report has been made with malicious intent, ulterior motive or for personal gain.

Any person that has not acted in good faith shall not be entitled to any protection under this Policy. Any person making a report that proves to have been made without good faith will be subject to disciplinary action (which may include termination of employment, cancelation of licence) using relevant tobacco industry laws, regulations and policies.

5.6.2 Reporting Options

A Whistle-blower may:

- choose to remain anonymous while disclosing a matter over the course of the investigation and after the investigation is finalised
- refuse to answer questions that they feel could reveal their identity at any time, including during follow-up conversations; and
- choose to adopt a pseudonym for the purposes of disclosing the matter.
- choose to disclose partial information about his / her identity. In this case the eligible recipient:
 - is the only party who is aware of the whistle-blower's identity; and
 - will implement these procedures to protect the whistle-blower's identity and maintain confidentiality from disclosure to other parties, unless such disclosure is authorised by the whistle-blower.

Notwithstanding whistle-blower's rights to remain anonymous, it should be noted that anonymity and withholding of information from the eligible recipient may impede the quality and efficiency of an investigation.

Also note that the Chief Executive Officer, Inspectorate division and the immediate supervisor of the employee may become involved in the conduct and management of a qualifying disclosure by virtue of their roles. In the event that the whistle-blower does not want one or more of these persons involved, a request should be made to the eligible recipient who in turn must comply with whistle-blower's request.

5.6.3 Qualifying Reporting Procedure

Various options are available for lodging a report of misconduct. A whistle-blower is free to use any option of choice or a combination of them including:

- a) A Buyer's employee's immediate supervisor (first recipient). If this is not appropriate e.g. if the whistle-blower is not comfortable to report to the immediate supervisor because he or she is the culprit or has not taken action in relation to an earlier report within a reasonable time, the whistle-blower can disclose the matter to any other Eligible Recipient listed in section 5.5.2 and 5.5.3 above.
- b) A physical meeting with the Inspectorate department to be scheduled following a request by the whistle-blower.
- c) TIMB's dedicated Tip Anonymous phone line of which the conversations are recorded but only with the consent of the whistle-blower.
- d) A deposit of the written allegation into the TIMB's suggestion boxes that is positioned at the TIMB Premises.

The qualifying disclosure should be made directly to an eligible recipient. The eligible recipient's role is to receive the disclosable matter. The first recipient tables the disclosable matter to the Inspectorate department of the Board. The Inspectorate department has been assigned with the following whistle-blow duties:

- i. Providing any interested person with information on the procedures for reporting infringements.

- ii. Receiving and following-up on reports of misconduct
- iii. Maintaining contact with the whistle-blower where the latter has identified himself.

In cases where the whistle-blower has disclosed his / her identity and contact details, TIMB may request in writing, through the postal or electronic address of the whistle-blower, or if such address has not been provided, orally from the whistle-blower to clarify the information reported or to provide additional information that is available to the whistle-blower.

5.7 Investigation procedure

After TIMB receives a report of misconduct from a whistle-blower, the investigation process will start in terms of the following procedure:

Action	Timeframe
<p>Upon receipt of the report of misconduct, TIMB, through the relevant recipient, acknowledges receipt using the contact details provided where possible unless the Board reasonably believes doing so jeopardises the protection of the whistle-blower's identity.</p> <p>For oral communication, where possible, TIMB, with the consent of the whistle-blower, shall document the communication by:</p> <ul style="list-style-type: none"> a. an audio recording of the conversation in a durable and retrievable form; or b. a complete and accurate transcript / minutes of the conversation is prepared by the dedicated staff members of the Inspectorate department. The whistle-blower may be required to check, rectify and agree with the transcript. A signed copy of such record shall be kept in a durable and retrievable form. 	2 days
Once the allegation has been documented, the allegation is subsequently recorded in the Suspicious acts Register.	3 days
The Inspectorate department assesses if the report of misconduct is a Qualifying Disclosure. If the report of misconduct is a Qualifying Disclosure, Inspectorate assesses if a formal, in-depth investigation is required.	5 days
Where in-depth investigation is required, the Head of the Inspectorate department reports the allegation to the Integrity Committee for due action to be taken. The Integrity Committee may either refer the matter to other competent external Authorities where the nature of the concern raised is deemed complex. Where the matter can be handled internally, an investigation is commissioned. The Integrity Committee refers the matter back to the	25 days

<p>Inspectorate department, as its secretariat, to initiate the internal investigation process.</p> <p>The investigation of the matter is conducted in accordance with the rules of natural justice and procedural fairness, with a view to gathering relevant evidence to determine whether the nature and substance of the allegations contained in the report is substantiated or unsubstantiated. The investigation process is independent of the whistle-blower, anyone who is the subject of the reported matter, and any person concerned. The whistle-blower shall give his/her full cooperation during the conduct of the investigation.</p> <p>The procedures of the investigation shall adopt the due processes to avoid any conflicts of interest and to ensure all due procedures are followed in a fair manner.</p> <p>Risk management shall form part of the investigation process through:</p> <ul style="list-style-type: none"> - Risk identification: Assessing whether anyone may have a motive to cause detriment. The investigating team shall gather information from the whistle-blower regarding the risk of their identity becoming known, any existing conflicts or threats - Risk analysis and evaluation: Any potential risk identified shall be analysed and evaluated to determine the severity of the potential impact. - Risk control: Strategies are developed and implemented on a case-by-case basis to prevent or contain the risks. - Risk monitoring: Any risk identified shall be monitored and reassessed where required 	
<p>Prepare a report and findings with whistle-blower's identity anonymised (where necessary)</p> <p>It is important to note that the method for documenting findings will depend on the nature of the misconduct. Where an extension of the investigation period is required, approval for the extension should be sought from the Audit Committee and where possible a preliminary report produced after the expiration of the initial 45-day investigation period.</p> <p>If the findings indicate that misconduct or wrongdoing has occurred, then the report must include recommendations to:</p> <ul style="list-style-type: none"> a) remedy any harm or loss that has arisen from the misconduct or wrongdoing (e.g. disciplinary proceedings against the person responsible for the conduct and the referral of the matter to regulatory authorities); and b) mitigate the future occurrence of the same or similar misconduct or wrongdoing. 	5 days

<p>Upon the completion of a report, the Inspectorate department will submit its findings to the Integrity Committee for final recommendation. The final recommendation is submitted to the Audit Committee for ratification. The ratified position is forwarded to the Board as appropriate, for final approval</p> <p>The final position as approved by the Board is delivered to the whistle-blower, if requested by the whistle-blower and subject to the whistle-blower providing adequate contact details for this purpose. Reports will be documented in accordance with the format set by the Integrity Committee from time to time.</p>	
<p>Implement recommendations, if any.</p> <p>Except for circumstance of a civil action or criminal charge, the final report and the intended enforcement action is shared with the reported person. The reported person must be given 7 days to tender a response The Audit Committee finalises its decision on the appropriate enforcement proportionate with the misconduct upon receipt of the reported person's representation.</p>	<p>Subject to the nature of recommendations within 5 days</p>

Note: that estimated actions and timeframes may vary depending on the complexity and nature of the Qualifying Disclosure. TIMB will update whistle-blowers, through Deloitte, with any changes to estimated actions and timeframes. TIMB will provide whistle-blowers with regular updates in relation to an investigation of a Qualifying Disclosure. Typically, updates will be provided at the start, during and at the end of an investigation, however, the frequency and timeframes for updates will also depend on the complexity and nature of the Qualifying Disclosure.

The actioning official in the investigations procedure may vary due to the nature of the issue reported and whether they are eligible to receive the report.

5.7.1 Limitations to investigations

Whistle-blower's need to be aware that TIMB may not be able to undertake an investigation if it is not able to contact the whistle-blower (e.g. if a Qualifying Disclosure has been made anonymously and the whistle-blower has refused to provide, or has not provided, a means for TIMB to contact them).

5.8 Protection

To encourage potential whistle-blowers to share their knowledge and information of any misconduct or wrongdoing within the Board, reports of misconduct qualify for protection under this policy if made in terms of sections 5.5, 5.6.3 and 5.6.4 of this Policy. A whistle-blower will still be protected under this Policy even if their Qualifying Disclosure remains anonymous, partial or redacted. Protection for whistle-blowers include:

- Confidentiality of the whistle-blower's identity.
- A prohibition on reprisals against whistle-blowers and their relatives.

- A civil right of action against persons who engage in reprisals and legislated authority for TIMB to investigate and take enforcement action where reprisals have occurred.

No person shall be prohibited or obstructed by the other from becoming a whistle-blower.

5.8.1 Confidentiality

A whistle-blower's identity is confidential and can only be disclosed in limited circumstances. Identifying information will remain confidential even in TIMB hearings or court trials unless it is necessary to demonstrate that a respondent or defendant has not committed the alleged misconduct, or the whistle-blower consents to such disclosure.

TIMB will take all reasonable steps to protect a whistle-blower's identity during an investigation and will not disclose:

- such identity
- information that is likely to lead to the identification of the whistle-blower which TIMB would have obtained as part of the reporting process.

Protection of records of information regarding the reports of misconduct will be securely stored and only disclosed to the relevant people as required or allowed by this policy and the law. The information will be managed in accordance with the Board's information security and confidentiality policies which impose controls such as access control and methods for storage and distribution. Any inappropriate disclosure of information may lead to disciplinary action, including termination of employment, as well as imprisonment and fines. A person involved in handling and investigating a report of misconduct will be reminded of their obligations as well as consequence for breach.

TIMB will not share such information with another regulator or law enforcement agency without the whistle-blower's consent except as permitted or required by law.

Although whistle-blowers will have their identity protected by the Board to the extent permitted by law, they may still be required to provide documents, additional information, or testimony if an investigation and /or a hearing proceeds.

If confidentiality is breached in any way, the whistle-blower is free to lodge a complaint through the complaints handling procedure.

5.8.2 Reprisals

It is against the law to take reprisal against a whistle-blower. TIMB has the power to take enforcement action against persons who take reprisals of any form against whistle-blowers whether express, implied, conditional or unconditional measure taken against a whistle-blower with a material adverse impact including:

- Suspension
- Termination of a contract

- Demotion
- Harassment
- Unfair treatment
- Blocked from doing business / investing
- Threatening to do any of the above

For the avoidance of doubt, the following do not constitute reprisal / detrimental conduct:

- reasonable administrative action taken to protect the whistle-blower from detriment (e.g. moving the whistle-blower's to a different working area to prevent detriment, subject to the whistle-blower's written consent); and

5.8.3 Civil, criminal and administrative liability protection

TIMB provides a civil right of action for whistle-blowers who have experienced reprisals. A whistle-blower is protected from any of the following in relation to a Qualified Disclosure that they make:

- civil liability (e.g. any legal action against the whistle-blower for breach of an employment contract, duty of confidentiality or another contractual obligation)
- criminal liability (e.g. attempted prosecution of the whistle-blower for unlawfully releasing information, or other use of the Qualified Disclosure against the whistle-blower in a prosecution (other than for making a false report))
- administrative liability (e.g. disciplinary action for disclosing the matter).

This protection does not grant immunity for any misconduct in which a whistle-blower has engaged.

5.8.4 Fair treatment of individuals mentioned in a Report of Misconduct

TIMB will ensure fair treatment of persons who are mentioned in a Qualifying Disclosure by ensuring that:

- Qualifying Disclosures will be handled confidentially, where practical and appropriate in the circumstances
- the primary objective of any investigation into a Qualifying Disclosure is to determine whether there is enough evidence to substantiate or refute the issues reported
- all investigations are undertaken in an objective, fair and independent manner
- a person who is the subject of a Qualifying Disclosure will be advised about the subject matter of the Qualifying Disclosure as and when required by principles of natural justice and procedural fairness and prior to any actions being taken; and

5.9 Breach of the Policy

Any breach of this policy may result in counselling or disciplinary action, including termination of employment, cancelation of licence, de-registration, or penalty.

Where a whistle-blower is aggrieved by the handling and outcome of the investigation, he / she is free to lodge a complaint with an eligible recipient and ask for it to be reviewed or approach the courts.

5.11 Enforcement Action by TIMB

TIMB's Audit Committee oversee the investigation reports of misconduct and take enforcement action with the approval of the whenever necessary.

Any person who has been subjected to a reprisal by his or her employer following the submission of a whistle-blower tip to the Board, may engage Deloitte. Deloitte will report the reprisal directly to escalation level 3.

Whistle blowers may also be eligible for rewards in terms of the reward policy in Annexure 1.

5.12 Ownership and Oversight of the Policy

The TIMB Audit Committee is responsible for the oversight of and is ultimately accountable for this Policy. The Audit Committee delegates the day-to-day responsibility for the administration and implementation of the Policy to the Integrity Committee.

5.13 Education and Awareness

- The Inspectorate department monitors the trend in reports of misconduct, keeps record of related statistics in the Suspicious acts Register and highlights any awareness gaps identified
- TIMB carries out periodic surveys to gauge external stakeholder understanding of the Policy
- The Board hosts regular external stakeholder workshops for education and awareness on any gaps identified.

Policy and Procedure Manual Approval

This policy document was approved by the Board of the Tobacco Industry and Marketing Board (TIMB) and signed on its behalf by:

.....
CHAIRPERSON

22/09/2022
.....
Date

Rewards Anonymous

Bronze Award

This is paid out for information that simply states HOW a theft, fraud or corruption is happening. There does not necessarily need to be a recovery of goods or monies stolen. Information in the tip-off must indicate where it is happening, how it is done, how often and how much is lost. The information should allow the company to change systems and procedures to prevent a recurrence.

The award would be up to 2.5% of the confirmed loss/ recovered amount or USD300.00, or whichever is lower.

Silver Award

Useful information that results in:

- ☐ Ability to change system to prevent recurrence (i.e. HOW it is done); AND
- ☐ Leads to recovery of goods or monies stolen; OR
- ☐ Conviction of the offender.

The award would be up to 5% of the confirmed loss/ recovered amount or USD500.00 or whichever is lower.

Gold Award

Outstanding information that results in:

- ☐ Ability to change system to prevent recurrence (i.e. HOW it is done); AND
- ☐ Leads to recovery of goods or monies stolen; AND
- ☐ Conviction of the offender.

The award would be up to 10% of the confirmed loss/ recovered amount or USD1000.00 or whichever is lower.

Platinum Award

This is paid out for outstanding information that results in extensive saving for the company.

The award would be up to 15% of the confirmed loss, recovered amount or USD2,500.00 per month or whichever is lower.

All awards will be paid out by Rewards Anonymous, which is part of Deloitte Tip-offs Anonymous. They will only pay out the amount on written instruction from the company that the criteria has been met and what amount to pay out.