

# RISK MITIGATION POLICY



2025

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## INTRODUCTION

Wetpaint complies with international standards of Risk Management; ensuring our standards directly assist and protect our organisation in the likelihood of any risks or threats that may occur; while ensuring effective use of resources in instances where risk treatment may be required.

This policy document serves as our risk compliance framework, establishing our set out threat mitigation strategies for our organisation's planning, strategising, execution, and operations in the case of any risk or threat occurring.

Wetpaint has identified, evaluated, and mitigated risk exposure across our entire organisation by considering two main factors for our business, namely, our risk probability and risk consequences.

This policy further ensures our company has limited exposure to any unnecessary financial losses or serious consequences resulting in reduced time, cost, and complexity from the vulnerabilities we have identified and disclosed in this document.

Below is our Six Step Risk Mitigation Planning, Implementation and Progress Monitoring Cycle followed to ensure low risk levels in our company - consistently.



## FINANCIAL RISK

Wetpaint has a detailed financial structure in place to independently verify and safeguard the integrity of our financial reporting.

Our company attends to consistent financial reviews, financial reporting, and strict authorisations to ensure truthful and factual presentation of our financial risks and remedies.

### FINANCE

### LEGAL REQUIREMENTS

### COMPANY INTERNAL REQUIREMENTS

<b>BANKING</b>	Secure Banking Institution and Private Banking Consultant	Dedicated/ Designated Internal Accounts Operation Employee
<b>INSURANCE</b>	Reputable Insurance taken out for company risk cover	Monthly instalments paid by Wetpaint to insurance provider
<b>POLICIES</b>	Business Interruption Insurance Theft Insurance Fire Insurance	Monthly instalments paid by Wetpaint to Insurance provider
<b>PAYMENTS PROCESSES</b>	Secure Online Banking Portal, Cellphone Banking Application All applications are password protected	Reputable Banking Institution
<b>PAYMENT RECORDS</b>	South African Revenue of Services – Record Keeping	Original and electronically filed and organised files of statements, invoices and receipts also backed up to our server
<b>DATA SYSTEM PROTECTION</b>	24 Hour IT Service provider	Server and Software Protection
<b>BUDGETING &amp; PREDICTION</b>	Advisory from our Financial Experts – Cost Estimating Income and Expenses	Financial Documents in chronological order and saved in hard copy and electronically on our Server
<b>COMPLIANCE AUDITS</b>	South African Revenue of Services – Annual Returns	Financial Documents in chronological order and saved in hard copy and electronically

## SECURITY RISK

Safety and security are not only a necessity but a priority at Wetpaint. We have gone to great lengths to identify all our company's assets and based on the outcome of our analysis, introduced safeguards to avoid predicted and unforeseen risks to our company.

Our risk measures not only ensure protection from intrusion, vandalism, robbery, or natural disasters but from dangers that may arise in and around our building; that could cause injury to people; therefore, we ensure our employees, clients and visitors are afforded reasonable protection when at Wetpaint premises.

Providing safe working conditions and maintaining adequate policies and procedures through constant implementation, review, and development, equally, ensures safe and efficient operating conditions for our employees and our facilities.

Wetpaint will not knowingly permit unsafe conditions to exist, nor will it permit its employees to indulge in unsafe acts. Violations of company policies and regulations can result in disciplinary action.

Wetpaint ensures the safety of our employees and physical property through the below policies and procedures in place:

- Location:
  - Our offices are located in the safe and influential area of Johannesburg known as Bryanston.
- Outdoor Safety and Security
  - Our offices reside within a secure office park with 24-hour armed response security.
  - Perimeter protection by means of sensors around the office park and our specific office building.
  - Secure fencing with electrical fence all around the perimeter.
  - Access card entry and exit for vehicles and pedestrians.
  - Password pad located by building and office entrance doors.
  - Two-way operating intercom access system for guests - ensuring granted access into the building.
  - Sensor alarm with security response service – in the event of an intrusion in our monitored areas, an alarm is triggered notifying our armed response company.
  - Secure underground and visitor parking facilities monitored by 24-hour guards and with remote access on entry and exit.
- Offices
  - Clearly marked emergency signs and exit points including our emergency evacuation procedures.
  - Clearly marked first aid box area.
  - Frequent updating of the first aid box ensuring no products are expired or finished, if so replacing such items.

- Emergency contact details visible and available to all employees on our HR board.
- Employees
  - Employees are also encouraged to make recommendations, suggestions or criticism to their line managers and our Health and Safety Officer regarding any area of safety and security within our workplace.
- Management
  - Managers are responsible for ensuring working conditions within their departments are safe at all times and policies in place are being adhered to too.
  - Therefore, Management remains alert at all times regarding any dangers or policies not being followed within their department, he or she may recommend or implement corrective actions.
- Health and Safety Officer and Fire Marshall
  - Our company has an appointed and certified Health and Safety officer and Fire Marshall on site for any unforeseen emergencies that may occur with employees or the business.
  - Their training and functions allow them to immediately assist and attend to workplace emergencies for employees that occur such as cuts, burns and CPR if required and thereafter following of our prescribed emergency protocols.
  - Our Health and Safety officer is responsible for developing, implementing, and improving our health and safety office plans and procedures. Whilst ensuring compliance with all relevant health and safety legislation.
  - Our Fire Marshall is responsible for developing our fire policy and conducting our fire drills; ensuring all employees are safe guarded and prepared in the instance of a fire occurring.
  - Annual inspections of our workplace are taken by our Health and Safety Officer and Fire Marshall, who will take appropriate action to ensure compliance if needed.
  - They respond to and investigate any concerns and complaints from employees then attend to the appropriate course of action.
  - Investigate accidents and injuries that occur within the workplace to establish if any preventative measure can be made to prevent reoccurrence of such accident/injury.
  - Recommend changes in procedures and updates all staff members annually.

## NATURAL DISASTER

Wetpaint in accordance with the Disaster Management Act 16 of 2005 has an integrated and coordinated disaster risk management policy that focuses on preventing or reducing the risk of disasters occurring, mitigating the severity of disasters, ensuing preparedness, as well as rapid and effective responses to disasters with post-disaster recovery implementation.

- Wetpaint Disaster guidelines:

- Planned and Unplanned Load Shedding:

Is an experience in South Africa when the demand for electricity exceeds the available supply resulting in planned supply interruptions being carried out known as load shedding.

Wetpaint has ensured control and safety measures are in place for when these planned and unplanned outages occur.

- Our company premises have an outdoor industrial generator, safely situated, that powers on immediately when an outage occurs. Our generator supports the company's electricity needs for a period of 24 Hours.
- Ensuring no downtime during working hours or disruptions to the workday for our employees, such as having to leave work early or take extended breaks.
- UPS Boxes for surge protection for each desktop at the company also allows for no "cuts" during load shedding as the UPS is charged and powers on immediately before the generator's 3 second kick in time and again no loss of information or electrical damage to our equipment.
- Back up servers are connected to both a UPS and the company generator ensuring work is saved and not lost on our Hard Drives or damaged.
- While ensuring constant back up measures are taken to secure and protect our company and client's information from load shedding, unexpected hard drive crashes or unforeseen electrical faults.

- Pandemics

Wetpaint has developed a workplace plan in a bid to facilitate the proper effective application of the Occupational Health and Safety Act, the COVID-19 direction on Health and Safety in the Workplace, issued by the Minister in terms of regulation 10(8) of the National Disaster Regulations and the regulations issued in terms of Section 27(2) of the Disaster Management Act.

- Covid19 Staff Questionnaire exists, and all new staff members are required to fill in the questionnaire, which is recorded electronically, and the hardcopy filed.
- A detailed workplace plan is formed regarding the rotation days staff members are to work in office or from home.
- Continued risk analysis are done at the office.
- All employees have to complete an Employee/Visitor Travel History and Health Disclosure document which are stored and filed.
- Employees ensure that all equipment, stationery, and tools are thoroughly cleaned after use on a daily basis.
- All work surfaces and equipment are disinfected before the working day begins.

- A duly appointed representative ensures adequate hygienic products such as soaps and hand sanitizer are available at all times.
- All door handles are sanitized on a daily basis.
- Sanitary facilities at the entrance and exit of the workplace are available to staff and visitors.
- Screening facilities and systems available – upon arrival and departure at Wetpaint; staff and clients/visitors can ascertain whether they have any of the observable symptoms associated with Covid-19 (fever, cough, sore throat, redness of eyes or shortness of breath).
- An Attendance record-system and infrastructure that is monitored on a daily basis by our appointed representative, in form of an attendance register is completed by staff and visitor/clients and if any of the mentioned parties do not sanitise and screen, they are not granted access into our office area.
- All meetings that take place at our offices require staff members to wear masks and sufficiently distance from one another within a ventilated area.

#### Visitors Guidelines:

- No handshakes or other physical contact is allowed between employees or employees and visitors/clients.
- Visitors should sanitise their hands upon entering Wetpaint offices with alcohol-based hand sanitizer, with an alcohol content of at least 70%.
- Visitors must wear a face mask or other facial protective gear when entering the premises.
- Visitors must practice social distancing away from any Wetpaint employee or other visitors in all circumstances.
- Any visitors at the Wetpaint premises must fill in the attendance register.
- Visitors shall be screened for any symptoms associated with Covid-19 and will not be allowed onto the premises if any symptoms are displayed.

#### ○ Remote Working:

- Wetpaint's staff members have been setup to work from anywhere in the world.
- Working in conjunction with our IT service provider all employees are assured their experience when working from home is well regulated, streamlined, secure and organised through our up-to-date provided technology.
- We have identified the importance of time saving by having our employees connected from any place in the world at any time ensures our business is fully functional for our diverse clientele positioned around the globe.
- Clients are assisted in real time according to their time zones.
- The outcome is overall increased organisation from employees while they are being providing more flexi time - improving their overall work-life balance.

- Higher productivity has been reported and recorded over the past two years of this implementation.
  - Increase in job satisfaction amongst employees.
  - Decrease in sick days taken by employees.
  - Reduced overhead costs for the company resulting in increased sustainability.
- Floods / Excessive Rainfall:
- Floods are a natural disaster that occurs around the world and a large element of flooding is out of person's hand. At Wetpaint we have ensured in the event a flood occurs while employees are in the office or not, our safety measures are covered.
  - Our location being Johannesburg, South Africa is inland which does help to a certain degree but that does not stop the substantial risk of flooding that occurs from heavy rainfalls during storms and rainy seasons.
  - Our Offices are located on the second floor of our office block providing minor protection against flooding on ground level.
  - Our main power box is located on the second floor of our office park which can be easily accessed and switched off in the event a flood occurs.
  - Available protective gear and evacuation plan in place for all employees and visitors/clients to ensure we can avoid flooded areas, aware of chemicals and biological hazards we may be exposed too and any potential fire hazards.
  - In the result of any damage to our company property as a result of flooding or excessive rainfall we have an insurance protection policy in place as well.
- Fire:
- Wetpaint has a trained and certified Fire Marshall onsite at all times.
  - Fire policy and annual drills.
  - Is an unforeseen and unexpected disaster that might occur whether it may be a building fire, veld fire or car fire we have implemented the following safety measure in the instance of a fire.
  - No exits or doors, stairway and halls are to be obstructed or blocked at any given time.
  - Our appointed Health and Safety Officer knows the building evacuation plan, performs regular risk assessments, and provides updated training to employees and ensures our workplace has reduced or removed fire hazard risks.
  - Fire alarms on all buildings and easily accessible fire extinguishers
  - Emergency telephone numbers for the fire department are easily accessible to all employees.
  - In the result of any damage to our company's property as a result of fire we have an insurance policy in place as well.

○ Drought or Water Outages:

- Certain regions in South Africa have experienced long periods of drought and in few cases, this has included Johannesburg.
- We have compiled a plan that identifies our risks should we be affected by a drought or water outage, ensuring our company is still able to reduce the impacts this may cause on our business.
- Monitoring of the incident and outage; knowing where to get our up-to-date information on the situation.
- Assessing business operations and the effects the drought or water outage is having on the business operations.
- Communication is crucial factor during a drought. Staff and customers will be notified of the ways in which the business has been impacted and if necessary, why the business will be operating on a complete remotely basis.
- Ensuring employee well-being and safety by being able to work remotely from the safety of their own homes.
- In the result of any damage to our company’s property as a result of drought or water outages we have an insurance policy in place as well.

**LEGAL RISKS**

Wetpaint ensures we are aware of our legal risk exposure and have implemented contracts that are in accordance with the law, legislation, and regulations for the operation of our company, its employees, our clients, and service providers.

As legal compliance ensures our organisation, and its employees are always abiding by the laws and regulations as per industry standards and within the South African jurisdiction in which we operate.

The following contracts are drawn up by our legal representatives ensuring our legal compliance.

Contracts	
<b>Employee Contracts</b>	Basic Condition of Employment Contract in accordance with the Act and salary bracket per South African Revenue of Services (SARS) as well as our Permanent Contract in accordance with the Act and salary bracket per SARS
<b>Mutual Separation Agreement</b>	Legally binding terms and conditions for the termination of an employment agreement which includes a waiver of rights by both parties to enable a “soft exit” of the employee
<b>Freelancer Contracts</b>	In place for assigned task to a person or entity which is external to our organisation

<b>Employee NDA</b>	Ensures employees undertake to maintain the confidentiality of any confidential information gained or accessed (whether intentionally disclosed or not) of our company and its clients
<b>Supplier NDA</b>	A contractual agreement we have in place for all our suppliers confirming the contractual agreement between two parties where one or both agree not to share certain information provided by the other party
<b>Operator Agreement (POPIA)</b>	Governs the relationship between a responsible party (ourselves) (as defined by POPIA) and an operator. Dealing with how an operator processes personal information for the responsible party as is required by law.

## SYSTEMS AND TECHNOLOGY

Wetpaint has a 24-hour IT service provider who attends to our daily technological areas of the business. We are provided with the latest business security software and the implementation of improved security practices on a continuous basis.

Wetpaint Security Software and Features:

<b>Anti-Virus:</b>	All machines and servers have Webroot Endpoint Protection for malware detection, user identity and privacy protection, intelligent firewall.
<b>Backups:</b>	Machine Data backup – Desktop, Documents and Favorites synced between server and desktop/laptop when connected the network.
	Server Data Backup – (Arcserve) Daily onsite backup. Daily offsite replication to ensure availability and data safety.  Bare metal restore capability (data can be stored to any hardware) On site backups and replication have a retention of 1 year daily, weekly, and monthly incremental backups
<b>Network:</b>	Is behind FortiGate with intrusion prevention, web filter, anti-virus and application control

<b>DNS:</b>	Protection on internet protection – stops connections pushing URLs in real time using Artificial Intelligence
<b>Emails:</b>	Advanced threat protection on all mailboxes which includes scanning for malicious files in e-mail

## PRIVACY OF DATA (POPIA)

### Purpose:

The Protection of Personal Information Act, 2013 (the Act), emanates from the South African Law Reform Commission’s report on privacy and data protection.

The Act aims to give effect to the right to privacy, by introducing measures to ensure that the personal information of an individual (also known as a data subject) is safeguarded when it is processed by responsible parties.

Creating a balance to the right to privacy against other rights, particularly the right of access to information, and to generally protect important interests, including the free flow of information within and across the borders of the Republic.

### Wetpaint Compliance:

- In accordance with the Act and our internal POPIA Manual.
- The processing of personal information is an asset that must be protected.
- The quality of the personal information has a direct influence on the value thereof.
- Compliance with personal information ultimately leads to cost savings e.g., operational costs.
- Compliance reduces risks.
- Compliance is increasingly becoming a prerequisite to transact with other companies and countries.
- Gives effect to the right to privacy as enshrined in our constitution.
- Provides balance in terms of the right to privacy weighed up against the right to access information.
- Describes/Regulates the way that information must be processed.
- In line with the UK and European legislations.
- Personal information about lawful – purpose specific data processing.

### Wetpaint Role Players

When deciding who the role players are the question is asked, is the Responsible Party domiciled in South Africa if not is the Responsible Party making use of automated or non – automated means of processing private information in South Africa

**Responsible Party** –A Company’s Employer is the data subject for all employee's personal information in our instance that would be CEO Petra Mc Cardle, however, deputies can be

appointed to filter down into different departments to ensure compliance with our POPI processes we have put in place. HR cannot be a Responsible Party as they are held responsible for every employee within the company. Any problems that arise with personal information the Responsible Party is liable, as they take all responsibility for their company complying with POPI.

**Third Party** – External Service Provider. We as a company cannot instruct them on what to do, as they have their own processes in place, they also have some rights as a Data Subject would to the Responsible Party, as well as the same rights to sue or complain e.g. Medical Aid Schemes, any problems that arise with personal information with Third Parties lie with the Responsible party.

**Data Subject** – Identifiable living subject deemed to be a juristic person by law with certain exclusions (death, journalism etc). Employees process data subjects' information on behalf of the employer and we are responsible in such regard – even data subjects who open their own business can be responsible for POPI

**Operator** – Directly process information e.g., Payroll and IT companies, however, IT companies can be both Operator and Third Party.

Wetpaint 8 POPIA Processing Conditions :



## WETPAINT COMPANY IMPLEMENTATION

### WETPAINT CEO AND DIRECTORS:

- Operator Agreements to be signed by all clients and third parties, filed in a locked cabinet and saved to a secure drive that only relevant parties have access too.
- Employee Contracts to be signed by all employees, filed in a locked cabinet and saved to a secure drive that only relevant parties have access too.
- Permission is explicitly granted by the Responsible Party to any parties who need to have access to servers where Data Subjects information is stored.
- Any devices off office premises such as hard drives, phones and laptops need to be password protected and locked at all times that they are unattended to.
- Backup Systems are in place for all Responsible Party's information and our Data Subjects information stored on our systems.
- Offices are to be locked at the end of each day where any financial or Data Subject information is being stored in that office. A copy of the key is to be given to our Receptionist should the office need to be entered at any point when one is not present.

### HUMAN RESOURCES & ADMINISTRATION DEPARTMENT:

- Ensure all Agreements are signed and stored in a locked cabinet and saved to a secure drive that only relevant parties have access too.
- Ensure all Data subjects employment contracts are signed and stored in a locked cabinet and saved to a secure drive that only relevant parties have access too.
- Ensure all Data Subjects and Third Parties have signed our Operator Agreement.
- Ensure Building security measures are working at all times.
- Ensure keep up to date with all POPI updates and implement any that are necessary to the company.
- Ensure Printing is filed away accordingly.
- Ensure all documents to be destroyed are shredded.
- Ensure computer screen is locked when not present.
- Ensure office is locked at the end of every day.
- Ensure telephone calls of sensitive nature are taken in private.
- Ensure all departments and staff members are following the POPI company guidelines and do frequent check-ins with departments (Report passwords, Drive passwords and relevant Parties have access only).
- Ensure all Archive process are being followed by relevant parties.

### DIGITAL DEPARTMENT:

- A date stamp when receiving new databases.
- A date stamp when it is time to get rid of them (this can be setup as reminders in the relevant persons outlook, they are to cc Chief Creative Office and HR in these reminders).
- Client is to fill out the short questionnaire when we receive databases from clients, this is to ensure that they have legally acquired this information and have the express consent to allow Wetpaint to work on their information provided to us.

- Anyone who uses Mailchimp needs to work off the checklist to ensure the unsubscribe link is working for any and every mailer sent out.
- Creative Cloud used for websites are access controlled and only work that is relevant to a client's request is done.
- Please take note that under no circumstances are these databases allowed to be shared with unauthorised personnel.
- All team members working from home need to ensure any devices that store client or company information on them e.g., phones, laptops or hard drives are password protected and locked at all times that they are left unattended too.

#### **WEBSITE DEVELOPMENT DEPARTMENT:**

- Needs to ensure all clients have signed an Operator Agreement.
- Needs to ensure all third-party company's we deal with (e.g., when running competitions) have also signed our Operator Agreement to deal with client (Data Subject) information we will be sharing with them for the purpose of the work in this regard.
- Ensure all Operator Agreements are sent to Ujala initialed and signed (completed in its entirety) to be saved in accordance with our POPI measures.
- All team members working from home need to ensure any devices that store client or company information on them e.g. phones, laptops or hard drives are password protected and locked at all times that they are left unattended too.

#### **CREATIVE DEPARTMENT:**

- Ensure the Google Drive is cleaned out at all times this ensuring information is up to date and relevant to all work done for clients.
- Ensure Google Drive is password protected and all information on the Drive is sufficiently secure.
- Relevant reports are password protected and the relevant parties have the password details and access.
- Ensure social media platforms worked on are following the GDPR Rules.
- All team members working from home need to ensure any devices that store client or company information on them e.g. phones, laptops or hard drives are password protected and locked at all times that they are left unattended too.

#### **WETPAINT GENERAL POPIA IMPLEMENTATION:**

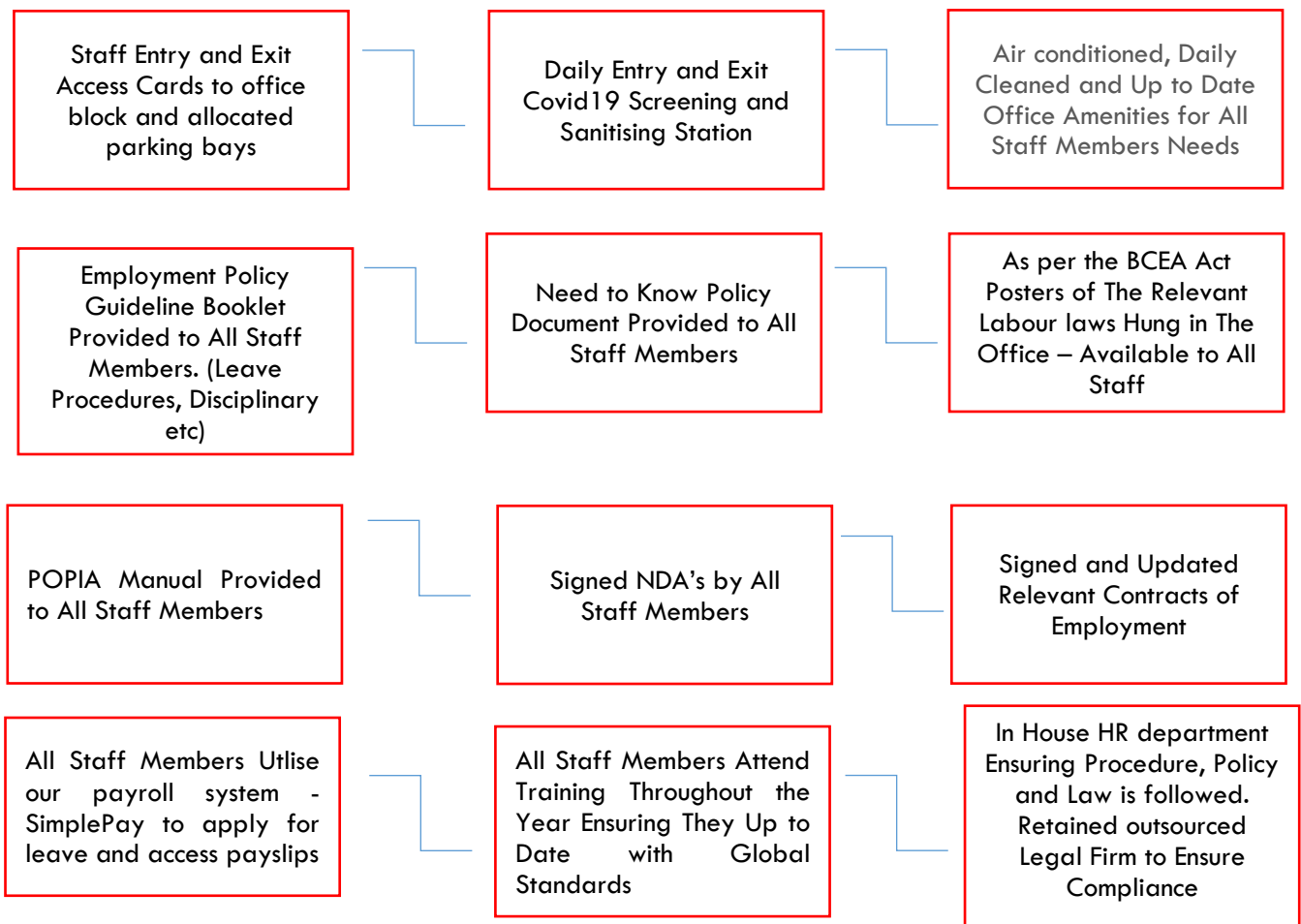
- Shredding of documents that contain clients or any individuals contact information (name, surname, address) and of course if the contents of the correspondence is sensitive it needs to be shredded – destroyed in such a way that it cannot be reconstructed.
- You need to ensure your printing is collected and not left lying around if it contains client information or employee information.
- Computer screens need to be always locked when not in use and the position of your screen needs to be checked if you deal with any personal employee or client information.
- Also consider laptops and phones - any items that hold information that are outside the building need to have necessary password protection and be locked at all times you are away from your devices.

- Phone Calls of sensitive nature that deal with client information need to be taken in private, in one of the offices or boardrooms that are available.
- Drives need to be closely monitored as to who has access to them and why.
- Reports of sensitive nature need to be password protected and relevant parties may only have access to these passwords.
- Files holding client information and employee information has to be stored in a locked cabinet.
- Offices that hold any client and employee information need to be locked daily at the end of the workday, a copy of the office key can be retained by Gloria and kept in a locked draw.
- Office security we need to have reasonable measures in place which we do – alarm system, keypad, locked doors and windows and security.

Please note this manual serves as a guideline for all staff members to ensure we at Wetpaint are in compliance with the POPI Act measures that are in place for information to be safeguarded when being processed by responsible parties

### STAFF CONTROL MEASURES:

Are compiled and followed by the frameworks in place from Wetpaint’s internal policies, the Basic Conditions of Employment Act and Code of Good Practices

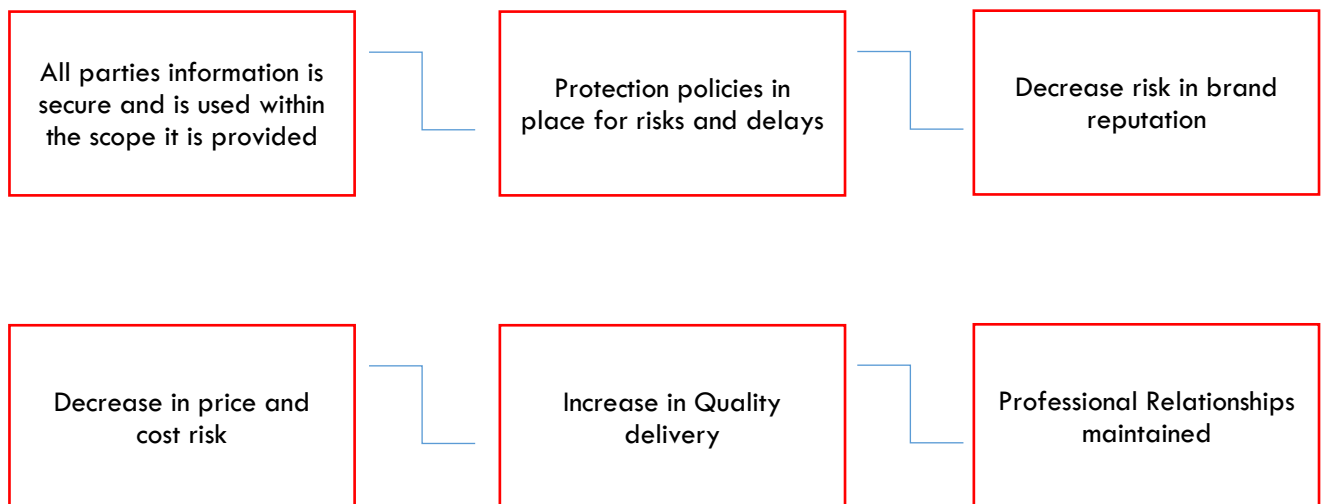


## SUPPLIER RISKS (THIRD PARTY RISKS)

Wetpaint has a vast and professional list of service providers that we work with to ensure our clients always receive the highest level of professional.

To ensure longevity, trust and professionalism with our suppliers and clients, Wetpaint has aligned and ensured required protection and processes are followed through our Suppliers; signed NDA's and Operators Agreement per the Protection of Personal Information Act.

Operations Agreement Ensures:



## CLIENT RISK

We work on ensuring preventative client risk management through the following process

- Identifying risks that may not be apparent and bring it our client's attention (Reducing business liability)
- Providing insights and support to clients'
- Assist in framing regulatory issues
- Improvement of resource deployment
- Attending to continuous improvement of product or service
- Increased chances of profitability in identify new opportunities
- Enhances stakeholder value



Please contact our Human Resources  
Department should you have any queries,  
Regarding any terms or processes in this policy document.

[Ujala@wetpaint.co.za](mailto:Ujala@wetpaint.co.za)

Yours sincerely  
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