Herbstgroup

CAREER MANAGEMENT, TRAINING AND DEVELOPMENT POLICY

Document Title	Career Management, Training and Development Policy
Document ID	POL-ESG-010
Version	1.0
Status	FINAL — FOR SIGNATURE
Effective Date	Upon CEO signature
Author	Dieter Herbst (CEO)
Reviewer	Tiaan Keyser (CAO)
Approver	Tiaan Keyser (CAO), Dieter Herbst (CEO)
Next Review	Annual (next: March 2027)
Classification	ESG
Framework References	ISO 27001:2022 (A.6.3, A.7.2), Skills Development Act 97 of 1998, National Qualifications Framework Act 67 of 2008, South African Qualifications Authority Act 58 of 1995, Employment Equity Act 55 of 1998, King V (2025), ILO C142 (Human Resources Development), UN Global Compact Principles, GRI 404 (Training and Education)
Distribution	Internal — Herbst Group

Change History

Version	Date	Author	Description
1.0	15 February 2026	Policy Engine	Initial formal conversion from markdown source

1. Change History

Version	Date	Author	Description
1.0	15 February 2026	Policy Engine	Initial version. 9 training categories, phased implementation plan (full motion by September 2026), ISO 27001 alignment, Skills Development Act compliance, cross-references to all 20 company policies, competence verification framework, training records standard, distributed ownership across all leadership.

2. CEO Statement

Herbst Group was built on the belief that people grow when they are trusted, supported, and given the tools to excel. Our approach to training and development reflects the same philosophy that guides everything we do: we lead with trust, we invest in people, and we celebrate growth.

In an industry as dynamic as pharmaceutical consulting, standing still is not an option. Our clients depend on us to bring the sharpest thinking, the latest intelligence, and the most rigorous standards to every engagement. That means every person in this company must have the opportunity and the support to keep learning, to develop new capabilities, and to advance their careers.

This is not a compliance exercise. This is who we are. We are an AI-native company that embraces innovation, and we expect every team member to have access to the tools and knowledge that make us exceptional. When our people grow, our clients benefit, and our business thrives.

Training at Herbst Group is not something that happens to you. It is something we build together.

3. 1. Purpose and Scope

1.1 Purpose

This policy establishes Herbst Group's commitment to the career management, training, and development of all personnel. It sets out the framework through which the company ensures that every team member has the knowledge, skills, and competence to perform their role effectively, to grow professionally, and to contribute to the company's mission of delivering excellence in pharmaceutical and healthcare consulting.

This policy fulfils the company's obligations under:

- The Skills Development Act 97 of 1998 and its amendments
- ISO 27001:2022 controls A.6.3 (Information security awareness, education and training) and A.7.2 (Competence)
- The National Qualifications Framework Act 67 of 2008
- The Employment Equity Act 55 of 1998 (Chapter III: affirmative action and skills development)
- King V (2025) principles of ethical and effective leadership, including stakeholder investment

1.2 Scope

This policy applies to:

- All Herbst Group employees (permanent, temporary, and part-time)
- All contractors and consultants engaged by Herbst Group for the duration of their engagement
- All directors and officers
- All training activities, whether delivered internally, externally, online, or through self-directed learning
- All work locations (office, remote, client sites)

1.3 Definitions

Term	Definition
Training	Structured learning activities designed to develop specific knowledge, skills, or competencies
Development	Broader activities that support career growth, including mentorship, job rotation, stretch assignments, and professional networking
Competence	The demonstrated ability to apply knowledge and skills to achieve intended results (per ISO 27001:2022 clause 7.2)
Awareness	The understanding of relevant policies, threats, responsibilities, and expected behaviours
NQF	National Qualifications Framework, the system for classifying qualifications in South Africa
SAQA	South African Qualifications Authority, the body responsible for NQF oversight
SETA	Sector Education and Training Authority, the body responsible for skills development in a specific economic sector

4. 2. Our Training Philosophy

Herbst Group's approach to training and development is grounded in the Conductor philosophy: we believe in trust, transparency, joy, and kindness. Training is not a punitive compliance exercise. It is an investment in every person's growth and a celebration of continuous improvement.

2.1 Guiding Principles

Principle	Application
Trust	We trust our people to take ownership of their learning. We provide the resources, the time, and the support.

Hherbstgroup

Transparency	Training expectations, opportunities, and records are visible and accessible. There are no hidden requirements.
Joy	Learning should be engaging, relevant, and rewarding. We celebrate completion and competence.
Kindness	Where gaps are identified, the response is support and coaching, not criticism or shame.
Excellence	Our clients rely on rigorously trained teams. Training is how we deliver on that promise.
Innovation	As an AI-native company, we embrace new tools and technologies and ensure every team member has access to them.

2.2 Client Trust

The foundation of our training programme is absolute trust to our customers. When a client engages Herbst Group, they need to know that every person working on their account is rigorously trained in data protection, ethical conduct, industry regulations, and professional standards. This policy ensures that trust is earned and maintained through documented, verifiable competence.

5. 3. Training Categories

Herbst Group's training programme covers nine categories. Each category addresses a specific dimension of professional competence, and together they ensure comprehensive development across all aspects of our business.

3.1 Policy Training

Every Herbst Group team member must understand and comply with the company's full policy suite. Policy training ensures that everyone knows what is expected, why it matters, and where to find the detail.

Requirement	Standard
All company policies covered during onboarding	Within first 30 days of joining
Annual policy refresher for all staff	Once per year, covering any updates or new policies
Assessment component	Acknowledgement and comprehension verification after each policy training session
New policy notification	Within 5 business days of any new or materially updated policy

Policies Requiring Training

Policy	Key Training Content
POL-ISMS-001 (Information Security Management System)	ISMS scope, objectives, security principles
POL-ISMS-002 (Risk Management)	Risk identification, assessment, treatment
POL-ISMS-003 (Information Security Incident Management)	Incident reporting, response procedures, escalation
POL-ISMS-004 (Business Continuity)	Business continuity planning, disaster recovery, roles
POL-ISMS-005 (Access Control)	Password requirements, MFA, access request process
POL-ISMS-006 (Information Security and Acceptable Use)	Acceptable use, mobile device policy, clear desk, whistleblowing
POL-ISMS-007 (Asset Management)	Asset inventory, classification, handling
POL-ISMS-008 (HR Security)	Pre-employment screening, NDA obligations, exit procedures

POL-ISMS-009 (Physical Security)	Office security, visitor management, equipment protection
POL-ISMS-010 (Employee Code of Conduct)	Professional conduct, confidentiality, IP, disciplinary framework
POL-ESG-001 (Environmental)	Environmental commitments, energy, e-waste, travel
POL-ESG-002 (Code of Ethics and Anti-Corruption)	Anti-bribery, gifts, conflicts of interest, whistleblowing
POL-ESG-003 (Health, Safety and Wellbeing)	Ergonomics, mental health, travel safety, incident reporting
POL-ESG-004 (Diversity, Equity, Inclusion)	Non-discrimination, harassment prevention, reporting
POL-ESG-005 (Sustainable Procurement)	Vendor sustainability criteria, due diligence
POL-ESG-006 (CSR and Sustainability Commitment)	Sustainability framework, SDG alignment
POL-ESG-007 (Data Privacy and Information Protection)	POPIA obligations, data subject rights, breach reporting, classification
POL-ESG-008 (Human Rights)	Constitutional rights, modern slavery, children's rights, GBV, whistleblower protection
POL-ESG-009 (Working Conditions)	Employment rights, equipment, amenities, flexible working
POL-ESG-010 (This policy)	Training obligations, development opportunities, self-assessment

3.2 Information Security Awareness

ISO 27001:2022 control A.6.3 requires that all personnel receive appropriate information security awareness, education, and training, and regular updates relevant to their job function. This is a cornerstone of our information security management system.

Training Topic	Audience	Frequency
Information security fundamentals	All staff	At onboarding and annually
Phishing recognition and social engineering	All staff	At onboarding and bi-annually
Data classification and handling	All staff	At onboarding and annually
Incident reporting procedures	All staff	At onboarding and annually
POPIA obligations and data subject rights	All staff	At onboarding and annually
Acceptable use of information systems	All staff	At onboarding and annually
Password management and authentication	All staff	At onboarding and annually
Secure remote working practices	All staff	At onboarding and annually
AI security and ethical AI use	All staff using AI tools	At onboarding and annually
Secure coding and development practices	Technical staff	Ongoing
Incident response procedures	Leadership and technical staff	Annually (tabletop exercise)
Vendor security assessment	Staff involved in procurement	At onboarding and annually

Assessment

Information security awareness training must include an assessment component to verify comprehension. This is required by ISO 27001:2022 control A.6.3 to demonstrate the effectiveness of the training programme. Assessment methods may include quizzes, scenario-based exercises, or practical demonstrations.

3.3 Career and Skill Advancement

Herbst Group invests in the professional growth of every team member. Career advancement is supported through structured development pathways, financial support for professional qualifications, and access to industry events.

Opportunity	Description	Support Provided
Professional certifications	Industry-recognised qualifications relevant to role	Financial support for course fees and examination costs
Conference attendance	Industry conferences, seminars, and workshops	Registration fees, travel, and accommodation
Higher education	Postgraduate study relevant to role and company objectives	Case-by-case financial support, flexible study arrangements
Mentorship	Pairing with senior professionals for guidance and development	Time allocation, structured programme
Cross-functional exposure	Opportunities to work across different company functions	Supported by management, documented in development plan

Skills Development Act Alignment

The Skills Development Act 97 of 1998 establishes a framework for developing and improving the skills of the South African workforce. Herbst Group aligns with the purposes and principles of the Act:

Act Requirement	Herbst Group Application
Improve the quality of life of workers, their prospects of work and labour mobility	Career development plans for all staff, certification support, transferable skills
Improve productivity in the workplace and the competitiveness of employers	Continuous professional development, industry training, technology skills
Promote self-employment	Entrepreneurial thinking supported within consulting roles
Improve the delivery of social services	Healthcare sector skills contribute to public health outcomes
Increase the levels of investment in education and training	Financial support for qualifications, conference attendance, learning resources
Encourage employers to use the workplace as an active learning environment	On-the-job learning, knowledge sharing, collaborative problem-solving
Encourage employers to provide employees with the opportunities to acquire new skills	New technology access, role expansion, stretch assignments

National Qualifications Framework

Where staff pursue formal qualifications, Herbst Group recognises and supports qualifications registered on the National Qualifications Framework (NQF) as established by the National Qualifications Framework Act 67 of 2008. This includes qualifications accredited by the South African Qualifications Authority (SAQA) and relevant Sector Education and Training Authorities (SETAs).

3.4 Access to Innovation

Herbst Group is an AI-native company. We believe that every team member should have access to the tools and technologies that define our competitive advantage. Access to innovation is not a privilege reserved for technical staff. It is a company-wide commitment.

Commitment	Application

AI tool access	All staff have access to company-approved AI tools relevant to their role
Data platform access	Staff working with data have access to the company's data infrastructure
Emerging technology exposure	Regular briefings on new technologies relevant to pharmaceutical consulting
Innovation time	Encouragement to explore new tools, techniques, and approaches within role boundaries
Knowledge sharing	Internal sessions where team members share what they have learned
Responsible use training	All staff trained on ethical and responsible use of AI and emerging technologies

Responsible Innovation

Access to innovation comes with responsibility. All staff must complete training on the ethical use of AI tools, data protection implications of new technologies, and the boundaries of responsible innovation (see POL-ESG-007 Section 7 on AI and Data Ethics).

3.5 Online Training

Herbst Group maintains a company training portal for structured, self-paced learning. Online training complements in-person sessions and provides flexibility for team members to learn at their own pace.

Feature	Description
Training portal	Company-hosted learning platform for policy training, skills modules, and assessments
Self-paced modules	Training content that can be completed at the learner's convenience within defined deadlines
Completion tracking	All module completions recorded and visible to the learner and their manager
Assessment integration	Online assessments embedded in training modules to verify comprehension
Content updates	Training content updated within 30 days of any policy or procedure change
Accessibility	Training materials designed to be accessible on standard company devices

3.6 Awareness Training

Beyond information security, Herbst Group provides awareness training on critical social, legal, and ethical topics. These topics are drawn from obligations established in other company policies and from our commitment to responsible business conduct.

Topic	Policy Reference	Audience	Frequency
Human rights awareness	POL-ESG-008 (Section 18)	All staff	At induction and annually
Gender-based violence awareness and response	POL-ESG-008 (Section 6)	All staff	At induction and annually
Data privacy and POPIA obligations	POL-ESG-007 (Section 15)	All staff	At induction and annually
Anti-corruption and ethical conduct	POL-ESG-002	All staff	At induction and annually
Health and safety (including ergonomics and mental health)	POL-ESG-003	All staff	At induction and annually
Environmental responsibility	POL-ESG-001	All staff	At induction and annually
Diversity, equity, and inclusion	POL-ESG-004	All staff	At induction and annually

Modern slavery and human trafficking indicators	POL-ESG-008 (Section 12)	All staff	At induction and annually
Children's safeguarding	POL-ESG-008 (Section 10)	All staff	At induction and annually
Whistleblower protection and reporting channels	POL-ESG-008 (Section 14), POL-ISMS-006 (Section 5)	All staff	At induction and annually
Sustainable procurement	POL-ESG-005	Staff involved in procurement	At induction and annually

3.7 Self-Assessment and Development Planning

Every team member is encouraged to take ownership of their professional development through regular self-assessment and manager-supported development planning.

Activity	Description	Frequency
Competence gap analysis	Self-assessment of current skills against role requirements and career aspirations	Annually
Development plan	Documented plan identifying learning objectives, activities, timelines, and support needed	Annually, reviewed mid-year
Manager conversation	Supportive discussion between the team member and their manager about development priorities	At least twice per year
Skills inventory update	Update of individual skills and qualifications in company records	Annually

How Self-Assessment Works

Self-assessment is not a performance judgement. It is a reflective exercise designed to help each person identify where they would like to grow and what support they need to get there. The process is:

1. The team member reflects on their current competencies, recent learning, and future aspirations
2. They identify areas where they would like to develop (technical skills, leadership, industry knowledge, certifications)
3. They discuss their reflections with their manager in a supportive, confidential conversation
4. Together, they agree on a development plan with realistic objectives and timelines
5. The company provides the resources, time, and financial support needed to execute the plan
6. Progress is reviewed informally throughout the year and formally at the next annual cycle

Where gaps are identified, the response is always support and coaching, never criticism or penalty. We are all learning. That is the point.

3.8 Management and Leadership Training

Herbst Group's leaders set the tone for the entire organisation. Leadership training ensures that managers lead with the company's values of trust, kindness, and joy, and that they have the skills to develop their teams effectively.

Topic	Audience	Frequency
The Conductor philosophy: leading with trust, kindness, and joy	All managers and team leads	At appointment and annually
People management fundamentals	All managers	At appointment and annually
Performance coaching and supportive feedback	All managers	Annually
Conflict resolution and difficult conversations	All managers	Annually
Mental health awareness for managers	All managers	Annually
Inclusive leadership and unconscious bias	All managers	Annually
Delegation and empowerment	All managers	As needed

| Strategic thinking and decision-making | Senior leadership | Annually |

The Conductor Philosophy in Leadership

Our leadership training is built on the Conductor philosophy. Just as a conductor brings out the best in every musician through trust, preparation, and shared purpose, our managers bring out the best in every team member through:

- **Trust:** Believing in people and giving them space to perform
- **Preparation:** Ensuring the team has the skills, tools, and knowledge to succeed
- **Shared purpose:** Connecting individual contributions to the company's mission
- **Celebration:** Recognising achievements big and small
- **Support:** Being present when things get difficult, offering coaching before correction

Leadership at Herbst Group is not about authority. It is about service. A manager's primary role is to remove obstacles, provide resources, and create the conditions for their team to thrive.

3.9 General and Industry Training

Herbst Group operates in the pharmaceutical and healthcare consulting sector. Staying current with industry developments, regulatory changes, and client knowledge is essential to delivering excellence.

Topic	Audience	Frequency
Pharmaceutical industry fundamentals	All staff	At onboarding
Regulatory landscape (SAHPRA, POPIA, NHI)	All staff	Annually and when significant changes occur
Client knowledge and commercial intelligence	Staff working on client engagements	Before engagement start and ongoing
Commercial excellence and sales force effectiveness	Staff in SFE roles	Ongoing
Market intelligence and data analysis	Analysts and consultants	Ongoing
Presentation and communication skills	All staff	As needed
Project management	Staff leading projects	As needed
Financial literacy	All staff	At onboarding

6. 4. Phased Implementation Plan

Herbst Group implements its training programme in three phases to ensure manageable rollout, shared accountability, and continuous improvement. The programme will be in full motion by the end of September 2026.

Phase 1: Foundation (March to May 2026)

Objective: Establish the essential training baseline for all staff. Build the infrastructure.

Activity	Target	Owner	Support
Policy training: all 20+ company policies	All staff complete initial policy training	CAO	COO coordinates scheduling
Information security awareness: fundamentals, phishing, data classification, incident reporting	All staff complete baseline security training	CTO	Head of Data supports with training analytics
POPIA obligations training	All staff	Information Officer	—
Acceptable use training	All staff	CTO	—
Code of Conduct training	All staff	CEO	COO facilitates session logistics

Training records system established	Tracking in place for all training activities	CAO	Head of Data builds completion dashboard
Assessment framework established	Comprehension verification methods defined and tested	CAO	CTO provides platform support
Data literacy fundamentals	All staff understand data classification and handling	Head of Data	CTO

Phase 2: Growth (June to July 2026)

Objective: Establish professional development pathways and individual development planning.

Activity	Target	Owner	Support
Individual development plans	All staff have a documented development plan	CEO	Line managers facilitate conversations
Certification pathway identification	Staff who wish to pursue certifications have been identified and supported	CEO	Finance confirms budget allocation
Leadership training programme launch	All managers complete initial Conductor leadership training	CEO	COO co-facilitates
Self-assessment process introduced	All staff complete first self-assessment	CAO	COO supports with one-on-one guidance
Conference and external training budget established	Annual budget allocated per team member	Finance	CEO approves allocation
Awareness training modules deployed	Human rights, GBV, anti-corruption, environmental, DEI training live	COO	CAO manages portal content
Client knowledge and market intelligence training	All client-facing staff complete baseline	Head of Data	CEO provides strategic context
Training completion analytics dashboard live	Leadership can monitor progress in real time	Head of Data	CTO ensures platform integration

Phase 3: Excellence (August to September 2026)

Objective: Advance to comprehensive leadership, innovation, and external development programmes. Full programme operational by end of September 2026.

Activity	Target	Owner	Support
Advanced leadership programme	Senior leaders complete advanced management training	CEO	COO co-facilitates
Innovation and technology training	All staff receive AI and emerging technology training	CTO	Head of Data supports with data platform onboarding
External training and conferences	Staff attend at least one external development event	CEO	Finance processes bookings and reimbursements
Industry-specific advanced training	Regulatory, commercial, and sector-specific modules deployed	CEO	Head of Data provides market intelligence content
Training programme effectiveness review	Full programme review against objectives and ISO requirements	CAO	Head of Data provides analytics report
Continuous improvement cycle established	Annual training plan published for 2027	CAO	All leadership contributes to planning
Skills Development Act annual reporting	Workplace Skills Plan submitted	Finance	CAO provides training data

7. 5. Training Records and Competence Documentation

5.1 ISO 27001 Requirements

ISO 27001:2022 clause 7.2 (Competence) requires the organisation to:

- Determine the necessary competence of persons doing work that affects information security performance
- Ensure that these persons are competent on the basis of appropriate education, training, or experience
- Where applicable, take actions to acquire the necessary competence and evaluate the effectiveness of those actions
- Retain appropriate documented information as evidence of competence

5.2 Training Records

Record	Contents	Retention
Training attendance register	Name, date, topic, trainer, format	Duration of employment plus 2 years
Assessment results	Name, date, topic, score, pass/fail	Duration of employment plus 2 years
Policy acknowledgements	Name, date, policy ID, version acknowledged	Duration of employment plus 2 years
Certification records	Name, certification, issuing body, date obtained, expiry	Duration of employment plus 5 years
Development plans	Name, objectives, activities, timelines, review notes	Duration of employment plus 2 years
External training records	Name, event, provider, date, certificate (if applicable)	Duration of employment plus 2 years

5.3 Record-Keeping Responsibilities

Role	Responsibility
CAO (Tiaan Keyser)	Maintains the centralised training register. Ensures records are complete and current.
CTO (Wimpie du Toit)	Maintains records for information security training and technical skills development.
Head of Data (Wayne Gray)	Supports training data integrity. Builds and maintains training analytics dashboards. Provides quarterly training trends analysis to leadership.
All managers	Ensure their team members' training records are up to date. Report completion to CAO.
All staff	Notify CAO of external training, certifications, and qualifications obtained.

5.4 Audit Evidence

Training records serve as evidence for:

- ISO 27001:2022 certification audits (A.6.3 and A.7.2 evidence)
- Skills Development Act compliance reviews
- Annual management reviews
- Client due diligence enquiries
- Regulatory inspections

Herbstgroup

8. 6. Assessment and Competence Verification

6.1 Assessment Methods

Method	Use Case	Frequency
Written acknowledgement	Policy training (confirming receipt and understanding)	At each policy training session
Online quiz or assessment	Information security awareness, POPIA, compliance topics	After each training module
Practical demonstration	Technical skills, tool proficiency	During performance reviews
Scenario-based exercise	Incident response, phishing recognition, data breach response	Bi-annually
Tabletop exercise	Business continuity, major incident response	Annually
Manager observation	On-the-job competence, client interaction quality	Ongoing
Self-assessment	Competence gap identification, development planning	Annually
Peer review	Collaborative quality assurance, knowledge sharing	As appropriate

6.2 Competence Standards

For each role, minimum competence requirements are defined. These include:

Competence Area	All Staff	Managers	Technical Staff
Company policy knowledge	Required	Required	Required
Information security awareness	Required	Required	Required
POPIA and data protection	Required	Required	Required
Industry knowledge (pharmaceutical sector)	Required	Required	Required
Anti-corruption and ethics	Required	Required	Required
Human rights and GBV awareness	Required	Required	Required
Leadership and people management	Not required	Required	Not required
Technical security skills	Not required	Not required	Required
AI and data platform proficiency	Awareness	Awareness	Required

6.3 Addressing Competence Gaps

Where a competence gap is identified through assessment, self-assessment, or manager observation:

1. The gap is discussed supportively between the team member and their manager
2. A targeted learning plan is agreed, with specific activities and timelines
3. The company provides the necessary resources (training, materials, mentorship, time)
4. Progress is reviewed at an agreed interval
5. Competence is re-assessed when the learning plan is complete

This process is developmental, not disciplinary. The goal is to help every person succeed.

9. 7. Cross-References to Training Obligations in Other Policies

The following table consolidates all training obligations established across Herbst Group's policy suite. This policy (POL-ESG-010) is the master training policy that governs how all these obligations are fulfilled.

Policy	Training Obligation	Reference
POL-ISMS-001	Awareness of ISMS scope, objectives, and security principles	General requirement
POL-ISMS-003	Incident reporting and response procedures	Incident management training
POL-ISMS-005	Password management, MFA, access control procedures	Access control training
POL-ISMS-006	Acceptable use, mobile device security, whistleblowing	Section 7.1 training table
POL-ISMS-008	Security awareness at onboarding and annually; competence assessment	Section 7 (A.6.3)
POL-ISMS-010	Professional conduct, confidentiality, IP, compliance training completion	Section 4
POL-ESG-001	Environmental awareness	Section on responsibilities
POL-ESG-002	Anti-corruption, ethics, gifts, conflicts of interest	Section on responsibilities
POL-ESG-003	Health and safety, ergonomics, mental health, travel safety	Section on responsibilities
POL-ESG-004	Diversity, inclusion, harassment prevention, unconscious bias	Section on responsibilities
POL-ESG-005	Sustainable procurement criteria, vendor due diligence	Section on responsibilities
POL-ESG-007	Data privacy awareness within 30 days of joining; POPIA obligations; data classification; breach reporting	Section 15
POL-ESG-008	Human rights, modern slavery indicators, children's safeguarding, GBV awareness, digital rights, whistleblower protection	Section 18
POL-ESG-009	Working conditions, equipment use, flexible working, grievance procedures	Section on responsibilities

10. 8. Responsibilities

Role	Responsibility
CEO (Dieter Herbst)	Overall accountability for training and development. Approves training budget. Sets strategic direction for professional development. Approves certification and conference requests above threshold. Leads Conductor philosophy and leadership training.
COO (Zelna Symms)	Coordinates awareness training delivery (human rights, GBV, DEI). Manages external training provider relationships. Supports flexible learning arrangements. Oversees onboarding training experience for new joiners. Coordinates with CAO on training calendar scheduling.
CAO (Tiaan Keyser)	Maintains centralised training register. Coordinates annual training calendar. Monitors completion rates. Prepares training evidence for audits. Manages training portal content. Leads policy training delivery and annual refresher programme.
CTO (Wimpie du Toit)	Delivers information security awareness training. Maintains technical training programme. Ensures training platform availability. Leads AI and technology training. Coordinates phishing simulation exercises.
Information Officer (Wimpie du Toit)	Ensures POPIA and data privacy training is delivered to all staff. Coordinates data protection awareness activities. Maintains data classification training materials.

Head of Data (Wayne Gray)	Develops data literacy training for all staff. Supports training analytics and reporting (completion dashboards, assessment trends). Leads client knowledge and market intelligence training. Maintains data platform onboarding for new team members. Supports the CAO with training records data integrity.
Finance (Malan Munnik)	Manages training and development budget. Processes certification fee reimbursements. Reports training investment to leadership. Coordinates Skills Development Act levy and reporting obligations. Tracks training ROI metrics.
Line Managers	Support team members' development plans. Conduct performance conversations. Identify training needs. Ensure team completion of mandatory training. Provide coaching and on-the-job development support.
All Staff	Complete all mandatory training within specified deadlines. Participate actively in development planning. Maintain personal training records. Share knowledge with colleagues. Report training needs to their manager. Contribute to a culture of continuous learning.

11. 9. Budget and Investment

Herbst Group allocates dedicated budget for training and development activities. This investment reflects our belief that continuous learning is essential to business excellence.

Investment Area	Description
Professional certifications	Course fees, examination costs, study materials
Conference and event attendance	Registration, travel, and accommodation
External training programmes	Specialist courses, workshops, and seminars
Internal training development	Content creation, platform maintenance, facilitator time
Learning resources	Books, subscriptions, online learning platforms
Training administration	Record-keeping, compliance reporting, platform management

Training investment is reviewed annually as part of the budget cycle. The CEO approves the annual training budget on recommendation from the CAO and Finance.

12. 10. Skills Development Act Compliance

10.1 Overview

The Skills Development Act 97 of 1998 establishes a framework for developing the skills of the South African workforce through:
- The National Skills Development Strategy
- Sector Education and Training Authorities (SETAs)
- The National Skills Fund
- Learnerships and skills programmes

10.2 Herbst Group Obligations

Obligation	Herbst Group Application
Workplace skills planning	Annual skills development plan aligned with business objectives
Skills development facilitation	CAO serves as the skills development facilitator
Training provision	Structured training across all nine categories defined in this policy
NQF alignment	Support for staff pursuing NQF-registered qualifications
Record-keeping	Comprehensive training records as evidence of skills development activities

Herbstgroup

Employment equity alignment	Skills development supports employment equity objectives (see POL-ESG-004)

10.3 Workplace Skills Plan

Herbst Group prepares an annual Workplace Skills Plan that:
- Identifies the training needs of all staff for the coming year
- Aligns training activities with business objectives and individual development plans
- Allocates budget for training and development
- Identifies external training providers where needed
- Reports on prior year training activities and outcomes

13. 11. Monitoring, Review, and Continuous Improvement

11.1 Training Programme Monitoring

Activity	Frequency	Owner
Training completion rate review	Monthly	CAO with Head of Data
Assessment pass rate analysis	Quarterly	Head of Data
Training feedback collection	After each training event	COO
Training records audit	Annually	CAO
Training analytics and trends report	Quarterly	Head of Data
Management review of training effectiveness	Annually	CEO
ISO 27001 internal audit of training controls	Annually	CTO
Awareness training content review	Annually	COO
Training programme update	Annually and after significant policy changes	CAO with CEO
Skills development reporting	Annually	Finance with CAO

11.2 Key Performance Indicators

KPI	Target	Measurement
Mandatory training completion rate	100% within specified deadlines	Training register
Information security awareness completion	100% annually	Assessment records
Policy acknowledgement rate	100% within 30 days of onboarding or policy update	Acknowledgement records
Development plan coverage	100% of staff have a current development plan	Development plan register
Assessment pass rate	90%+ on first attempt	Assessment records
External training participation	At least 1 event per person per year (Phase 3)	Training register

11.3 Continuous Improvement

The training programme is reviewed annually to ensure it remains:
- Aligned with business objectives and industry developments
- Compliant with legislative and regulatory requirements

- Effective in developing staff competence and closing skills gaps
- Responsive to feedback from participants and managers
- Current with emerging topics (new regulations, new technologies, new threats)

Where training is found to be ineffective or insufficient, corrective actions are identified and implemented as part of the annual review cycle.

14. 12. Applicability

This policy applies to:

- All Herbst Group employees, contractors, and temporary staff
- All training and development activities (internal, external, online, self-directed)
- All work locations (office, remote, client sites)
- All professional development support (financial, time, resources)

15. 13. Review

This policy shall be reviewed annually, or following:

- Significant changes in applicable legislation (Skills Development Act, POPIA, Employment Equity Act)
- Changes in ISO 27001:2022 requirements or audit findings
- Significant changes in business operations, workforce composition, or industry landscape
- Feedback indicating that training programmes require material update
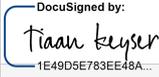- Any incident where a training gap contributed to a policy violation or security incident

The next scheduled review is March 2027.

16. 14. Cross-References

Policy	Relevance
POL-ISMS-006 (Information Security and Acceptable Use)	Information security training requirements, acceptable use awareness
POL-ISMS-008 (HR Security)	Security awareness training at onboarding and annually, competence assessment, training records
POL-ISMS-010 (Employee Code of Conduct)	Training completion obligations, professional conduct standards
POL-ESG-001 (Environmental)	Environmental awareness training
POL-ESG-002 (Code of Ethics and Anti-Corruption)	Anti-corruption and ethics training
POL-ESG-003 (Health, Safety and Wellbeing)	Health and safety training, mental health awareness
POL-ESG-004 (Diversity, Equity, Inclusion)	DEI and harassment prevention training
POL-ESG-005 (Sustainable Procurement)	Sustainable procurement awareness for procurement-involved staff
POL-ESG-006 (CSR and Sustainability)	Sustainability framework awareness
POL-ESG-007 (Data Privacy and Information Protection)	POPIA training within 30 days, data classification, breach reporting
POL-ESG-008 (Human Rights)	Human rights, GBV, modern slavery, children's safeguarding, whistleblower protection training
POL-ESG-009 (Working Conditions)	Working conditions awareness, equipment use, employee voice

17. Approval

This document has been reviewed and approved by the signatories below.

Role	Name	Title	Signature	Date
Prepared by	Policy Engine	Automated	N/A	15 February 2026
Reviewed by	Tiaan Keyser	CAO, Herbst Group	*Tiaan Keyser* DocuSigned by: 1E49D5E783EE48A...	15-Feb-2026 | 13:30:31 EET
Approved by	Tiaan Keyser	CAO, Herbst Group	*Tiaan Keyser* DocuSigned by: 1E49D5E783EE48A...	15-Feb-2026 | 13:30:31 EET
Approved by	Dieter Herbst	CEO, Herbst Group	DocuSigned by: F5B543C4DD1F4AD...	15-Feb-2026 | 13:29:43 EET