

SETTLEMENT AGREEMENT

Entered into by and between:

Lavenia Nicholson ("The Employee")

Personal Number: **50611810**

Department: Department of Local Government

Position: Deputy Director: Preparedness and Response

And

Department of Local Government ("The Employer")

Represented by: Graham Pause, Head of Department

Together referred to as "the Parties."

WHEREAS:

1. The Employee was appointed to act in the post of Director: Disaster Operations from 1 November 2023 to 28 February 2024. ("the acting period").
2. The Employee contends that she is entitled to receive an acting allowance in terms of the applicable provisions of the Public Service Regulations, 2016 and relevant GPSSBC Resolutions.
3. A dispute relating to the non-payment of such allowance was referred to the General Public Service Sectoral Bargaining Council (GPSSBC) under case number GPBC506-2025
4. The Parties now wish to resolve the dispute amicably and without further litigation.

NOW THEREFORE IT IS AGREED AS FOLLOWS:

1. **Payment Terms**

The Employer undertakes to pay the Employee R60 000, subject to normal statutory deductions. Payment will be made to the Employee within 30 days of the signing of this agreement.

2. **Full and Final Settlement**

This Agreement constitutes full and final settlement of all claims the Employee may have against the Employer in relation to the dispute referred to the GPSSBC.

3. **Withdrawal of GPSSBC Dispute**

The Employee agrees to withdraw the dispute referred to the GPSSBC under case number GPBC506-2025 within five working days of receipt of the agreed payment.

4. **Non-Admission of Liability**

This Agreement shall not be construed as an admission of liability by the Employer but is entered into purely for the purpose of resolving the dispute.

5. **Governing Law**

This Agreement shall be governed by the laws of the Republic of South Africa.

6. **Entire Agreement**

This Agreement constitutes the entire agreement between the Parties regarding the subject matter hereof.

SIGNED at Parow on this 26 May 2025


(Employee)

As witnesses

1. S. Kolbee
2. L. Christian

SIGNED at Cape Town on this 23 May 2025

[Signature]
(Employer)

As witnesses

1. [Signature]

2. [Signature]