

Document owner:	HR-Manager UK	Rev no.:	1.1
Approved by:	Chief Executive Officer	Revision date:	03-09-2020
Document status:	Approved	Page-number	Page 1 of 2

## Whistleblowing Policy

### 1.0 Objective

Boluda Towage Europe are committed to conducting our business with honesty and integrity, and we expect all staff to maintain high standards in accordance with our Anti-Bribery Policy, Modern Slavery Policy and Code of Conduct.

However, all organizations face the risk of things going wrong from time to time, or of unknowingly harboring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring and to address them when they do occur.

The aims of this policy are:

- To encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.
- To provide staff with guidance as to how to raise those concerns.
- To reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

This policy covers all employees, officers, consultants, contractors, volunteers, casual workers and agency workers.

### 2.0 Whistleblowing

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:

- Criminal activity;
- Failure to comply with any legal obligation or regulatory requirements;
- Miscarriages of justice;
- Danger to health and safety;
- Damage to the environment;
- Bribery;
- Facilitating tax evasion;
- Financial fraud or mismanagement;
- Breach of our internal policies and procedures;
- Conduct likely to damage our reputation or financial wellbeing;
- Unauthorized disclosure of confidential information; and
- Negligence.

This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work.

If you are uncertain whether something is within the scope of this policy you should seek advice from the appointed person.

### 3.0 Confidentiality

Boluda Towage Europe hope that staff will feel able to voice whistleblowing concerns openly under this policy.

Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to the appointed person and appropriate measures can then be taken to preserve confidentiality. If you are in any doubt you can seek advice from Protect, the independent whistleblowing charity, who offer a confidential helpline. Their contact details are at the end of this policy.

Otherwise we encourage staff to openly raise their voice, also to further investigate the matter when required.

Document owner:	HR-Manager UK	Rev no.:	1.1
Approved by:	Chief Executive Officer	Revision date:	03-09-2020
Document status:	Approved	Page-number	Page 2 of 2

#### 4.0 Investigation

For each concern raised, an initial assessment will be executed to determine the scope of any investigation.

An investigator or team of investigators including staff may be appointed with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable us to minimize the risk of future wrongdoing.

The whistleblower will be kept informed of the progress of the investigation and its likely timescale.

However, sometimes the need for confidentiality may prevent that specific details of the investigation or any disciplinary action taken as a result can be given. Any information about the investigation shall be treated as confidential.

If one conclude that a whistleblower has made false allegations maliciously, the whistleblower will be subject to disciplinary action.

#### 5.0 External disclosure

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace.

The law recognizes that in some circumstances it may be appropriate to report concerns to an external body such as a regulator. It will very rarely if ever be appropriate to alert the media.

We strongly encourage to seek advice before reporting a concern to anyone external.

The independent whistleblowing charity, Protect, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. Their contact details can be found in the code of conduct.

Whistleblowing concerns usually relate to the conduct of staff, but they may sometimes relate to the actions of a third party, such as a customer, supplier or service provider. We encourage to report such concerns internally first by contacting your line manager.

#### 6.0 Protection of whistleblowers

Whistleblowers must not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavorable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Whistleblowing Officer immediately. If the matter is not remedied you should raise it formally using our Grievance Procedure.

Geert Vandecappelle  
Chief Executive Officer



Boluda Towage Europe  
Date: 03-09-2020