



Delivering your strategy.

Whistleblowing Policy

January 2021





1. POLICY STATEMENT

GAC Group (**GAC**) is committed to conducting its business in an honest, ethical and transparent manner. From time to time however, all organisations face the risk of business falling below such standards. A culture of openness and accountability is essential to prevent such situations occurring and to address them in the correct manner 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 appropriately with their confidentiality respected at all times
- To provide all employees with guidance as to how to raise those concerns
- To reassure all employees that they should be able to raise genuine concerns in good faith without fear of reprisals, even if they turn out to be mistaken

2. WHO IS COVERED BY THE POLICY?

All individuals working at all levels of the organisation, including senior managers, officers, directors, employees, consultants, contractors, trainees, homeworkers, part-time and fixed-term workers, casual and agency staff (collectively referred to as **employees** in this policy).

3. WHAT IS WHISTLEBLOWING?

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

- Criminal activity
- Miscarriages of justice
- Danger to health and safety
- Damage to the environment
- Failure to comply with any legal or professional obligation or regulatory requirements
- Bribery
- Financial fraud or mismanagement
- Negligence
- Breach of our internal policies and procedures including the GAC Code of Ethics
- Conduct likely to damage GAC's reputation
- Deliberate concealment of any of the above matters

A **whistle-blower** is a person who raises a genuine concern in good faith relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of GAC's activities (a **whistleblowing concern**) you should report it under this policy.

This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases, you should use the grievance procedure in place in your organisation.

If you are uncertain whether a concern is within the scope of this policy, you should seek advice from the GAC Compliance Team via the email address (groupcompliance@gac.com). Alternatively, you can submit your concern to the dedicated whistleblowing email address (whistleblowing@gac.com).



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Whistleblowing Policy

4. RAISING A CONCERN

GAC encourages employees, as a first step, to speak to their line managers. They may be able to agree a way of resolving your concern quickly and effectively. In some cases, they may refer the matter to the GAC Compliance Team.

Where the matter is more serious, or you feel that your line manager has not addressed your concern, or you would simply prefer not to raise the issue directly with your line manager for any reason, concerns can be referred to the GAC Compliance Team as per the contact details above.

5. CONFIDENTIALITY

Employees are **not encouraged** to make disclosures anonymously as a comprehensive investigation may be more difficult or impossible if further information cannot be obtained from you. It is also more difficult to establish whether any allegations are credible and have been made in good faith should an anonymous disclosure be made.

It is however GAC's intention that employees feel able to voice whistleblowing concerns openly. If you want to raise your concern confidentially, every effort will be made to keep your identity secret and to handle your report with discretion.

6. INVESTIGATION AND OUTCOME

GAC is committed to conducting any investigation in a **timely, objective and thorough manner**.

Once you have raised a concern, an initial assessment will be carried out to determine the scope of any investigation. You may be required to attend additional meetings in order to provide further information.

In some cases, an investigator or a team of investigators may be appointed including employees with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.

GAC will aim to keep you informed of the progress of the investigation and its likely timescale. You will be informed of the outcome of the investigation however, sometimes the need for confidentiality may prevent us giving any specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

If it is concluded that a whistle-blower has made false allegations maliciously, in bad faith or with a view to personal gain, the whistle-blower may be subject to disciplinary action.

7. IF YOU ARE NOT SATISFIED

The outcome you are seeking cannot always be guaranteed. It should be noted however that your concern will be dealt with fairly and in an appropriate manner. By following this policy, you can help us to achieve this.

If you are not satisfied with the manner in which your concern has been handled, you may contact the Group President (whistleblowing@gac.com).



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Whistleblowing Policy

8. PROTECTION AND SUPPORT FOR WHISTLEBLOWERS

We are committed to ensuring that employees do not suffer any detrimental treatment as a result of raising a concern.

Openness is encouraged and employees who raise genuine concerns in good faith under this policy will be supported, even if they turn out to be mistaken.

If you believe that you have suffered any such detrimental treatment, you should inform the GAC Compliance Team immediately. If the matter is not remedied, you should raise it formally using the grievance procedure.

Employees must not threaten or retaliate against whistle-blowers in any way. Anyone involved in such conduct will be subject to disciplinary action.