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## WHISTLEBLOWER POLICY

This policy has been adopted by Albacore Holdings Jersey Ltd on behalf of itself and all of its direct and indirect subsidiaries. References to “Apogee” or “Albacore” in this policy are intended to refer to Albacore Holdings Jersey Ltd and all of its direct and indirect subsidiaries.

### PURPOSE

Under the Public Interest Disclosure Act 1998 (PIDA), the Employment Rights Act 1996 and the Enterprise and Regulatory Reform Act 2013, protection is afforded against victimisation or dismissal for workers who report (“blow the whistle”) on criminal behavior or other misconduct within an organisation either to the employer, a regulatory or other body.

### SCOPE

The act applies to ‘worker’s within Great Britain, including employees, contractors providing services, agency workers, home workers and trainees on work experience or vocational schemes. Employees or workers who are posted outside Great Britain but whose work is for the purpose of a business in Great Britain, whose base is in Great Britain or who has a substantial connection with Great Britain are covered.

This procedure applies to all employees of Apogee Corporation Limited.

General examples of whistleblowing matters may include but are not limited to the following:

- A criminal offence. Further to the introduction of the Bribery Act 2010 this includes the provision of or accepting of bribes in order to gain to improve the prospects of gaining business, failing to prevent bribery or bribing a foreign official;
- Fraud;
- Financial mismanagement or corruption;
- Health and safety issues in the workplace that puts the safety of workers or visitors at risk;
- A failure to comply with a legal obligation or breaches of legislation
- A miscarriage of justice
- Risks of damage to the environment
- Deliberate concealment of information relating to any of the above

The legislation covers internal disclosures to the employer and disclosures to prescribed regulatory bodies such as HMRC, the Financial Conduct Authority, the Health and Safety Executive, the Information Commissioner and Pensions Regulator.

### QUALIFYING CONDITIONS

The employee or worker must make the disclosure in the reasonable belief that it is in the public interest. Whilst the disclosure need not be made in good faith i.e. where the whistleblower has a reasonable suspicion that the alleged malpractice has taken place, employees and workers should be aware that if the matter is subject of a formal tribunal at a later date, reductions in compensation can be affected as a result of failing to do so.

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## PROCEDURE

- 4.1 In the first instance any concerns should be raised in writing with the employee's line manager.
- 4.2 If the individual does not feel comfortable raising the matter with his or her manager, or it does not seem appropriate, then the concern should be raised with another member of management, Human Resources, the Legal Department, or integrity@apogeeCorp.com.
- 4.3 Concerns raised will be treated with the utmost confidentiality and will be investigated fully. The employee will be advised of the outcome of the investigation.
- 4.4 Employees should be reassured that there will not be any harassment, victimisation or other detriment for reporting such actions either from the Company or their colleagues. If an employee experiences or has a genuine fear of reprisals, these should be raised with the employer or can be raised with the regulator or other relevant body. The Company will take all reasonable steps to prevent such behaviour.
- 4.5 Employees who have concerns or complaints regarding their employment or employment matters which are not in the public interest may raise these issues under the Company's Grievance Procedure.
- 4.6 Employees who subject colleagues who have made disclosures under this procedure to bullying, harassment or some other detriment are likely to be subject to the Company's Disciplinary Procedure and this may be considered a gross misconduct offence.
- 4.7 Employees who raise malicious claims under this policy may be subject to the Company's Disciplinary Procedure.