

## WHISTLEBLOWING POLICY

### PURPOSE AND SCOPE

Blue Hackle Limited is committed to creating and maintaining a culture of openness within our organisation so that individuals feel encouraged and confident to raise any concerns where there is reasonable belief that a non-conformance of the ISO 18788 standard has occurred.

This policy has been created to help Blue Hackle Limited deal with a concern in an appropriate manner. This policy serves as a deterrent to those who may be considering an illegal, improper, or unethical practice and to help Blue Hackle Limited to reduce problems and improve working conditions and operational effectiveness.

We also recognise the negative effect which malpractice can have on the organisation, and therefore encourage individuals to raise genuine concerns, or any suspicions they may have concerning misconduct. Furthermore, this policy is made available to any individual working on behalf of Blue Hackle.

This Policy is intended to cover concerns that are made in the public interest. If the matter is of an individual or personal nature it should be pursued through the Grievance Procedure. Complaints relating to discrimination, victimisation or harassment should be dealt with through the Grievance Procedure.

This Policy applies to anyone who is working on behalf of Blue Hackle and clients will be informed of reported violations of law or respect for human rights.

This Policy is non-contractual and may be amended by us at any time.

### PROTECTION

We appreciate that those reporting concerns may be apprehensive. We want to reassure you that you will suffer no detrimental treatment as a result of voicing your concerns and respect your right to anonymously report the non-conformance internally, as well as externally to appropriate authorities. We encourage anyone working on our behalf to voice their concerns over malpractice and inappropriate acts against any internal or external stakeholder.

We will not tolerate victimisation, harassment, bullying or any other detrimental treatment of individuals who make a disclosure in good faith under this Policy. Complaints about such behaviour will be dealt with under the Disciplinary Procedure.

Should you feel you have been subjected to any detriment as a result of raising a concern under this Policy you should notify your line manager or for third parties, notification to a member of the management team.

## **DISCLOSURES UNDER THIS POLICY**

Whistleblowing occurs when a person working on behalf of Blue Hackle Limited raises a concern about danger, unethical conduct, or illegality that affects others, internally or externally.

Effective whistle-blower policies provide individuals with an alternative route other than their direct line management through which to raise their concerns. Therefore, organizations should establish and communicate a whistle-blower policy that provides for a clear internal mechanism for anonymously reporting non-conformances and concerns about danger, unethical conduct, or illegality that affects others, internally or externally. The policy should also designate circumstances and conditions where external disclosures are acceptable and protected, and where matters need to be referred to the appropriate authority. Whistle-blowers should receive protection for raising concerns so long as they have acted in good faith and have reasonable grounds for raising a concern.

You can make a disclosure under this Policy if you have genuine concerns relating to any of the following areas of malpractice, or suspected malpractice:

- Criminal activity
- Miscarriages of justice
- Practices endangering health and safety
- Practices damaging the environment
- Failure to comply with a legal obligation
- Bribery
- Financial malpractice, impropriety or fraud
- Attempts to conceal any of the above

The malpractice can be past, present or prospective. It may have occurred inside or outside of Iraq. You are encouraged to report suspected wrongdoing as soon as possible. No action will be taken against you if you raise genuine concerns even if the concern you raised is not confirmed by any subsequent investigation.

## **CONFIDENTIALITY AND ANONYMITY**

Any disclosure you make under this Policy will be treated as far as reasonably practicable in a confidential and sensitive manner. If confidentiality is not reasonably practicable, for instance, because of the nature of the information, this will be explained to you.

We hope you will feel comfortable to voice any concerns openly, however, you may make a disclosure anonymously. However, concerns expressed anonymously cannot be dealt with as effectively as open disclosures as they are often more difficult to investigate.

## **HOW TO MAKE A DISCLOSURE**

In the first instance you should bring the matter to a member of the Senior Management Team if you are communicated from outside of Blue Hackle Limited and for employees, the attention of your immediate manager, who will inform a member of the Senior Management Team. If the disclosure contains allegations about your immediate manager or the malpractice occurs at this level, you may make the disclosure directly to a member of the Senior Management Team. If your disclosure contains allegations, which you do not wish to make to the Senior Management Team, you can make the disclosure to the Iraq Country Manager. If you feel apprehensive about reporting your disclosure to the Iraq Country Manager, you may report your disclosure anonymously at [ethics@bluehackleint.com](mailto:ethics@bluehackleint.com).

If your disclosure concerns a very serious allegation the Board will be notified.

## **INVESTIGATION**

Once a concern has been raised, we will investigate this. If you have not made the complaint anonymously, you will be asked to attend a meeting as part of this investigation.

We will keep you informed as to the progress of the investigation, as far as is possible and appropriate bearing in mind, in particular, any confidentiality obligations that apply. Please note that you will not be given details of any disciplinary action taken unless we consider this appropriate.

## **DISSATISFACTION WITH THE OUTCOME OF THE PROCESS**

If you are dissatisfied with the outcome of the investigation, you should raise this with the Iraq Country Manager, giving the reasons for your dissatisfaction. He will respond in writing notifying you of his acceptance or rejection of the need for further investigation and the reasons for this.

## **TRAINING**

All of our workers will receive an appropriate briefing to ensure that they are fully aware of their rights and responsibilities under this Policy. This Policy will be made available to all employees via employee handbook. All managers will be fully briefed as to their role in supporting this Policy and the appropriate action to take in the event of any disclosure being made to them.

**BREACH OF THIS POLICY**

We may invoke the Disciplinary Procedure if you are found to have subjected a whistle-blower to any form of detrimental treatment. It may also be invoked if you have intentionally misled us in respect of any matter, breached this Policy in any other way and/or if we believe that you have made a false allegation maliciously.



Craig Brewitt  
Iraq Country Manager  
14th July 2019