

سياسة المبلغين عن المخالفات ٢٠١٩ WHISTLE BLOWER POLICY 2019

شركة الخليج للمخازن
Gulf Warehousing Company Q.P.S.C (GWC)

تم الموافقة على السياسة من قبل الأشخاص التالي ذكرهم

Approved By

1 - 1 - 2019

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1 - 1 - 2019

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Introduction:

GWC is committed to maintaining the highest standards of business conduct and ethics, as well as full compliance with all applicable government laws. GWC is committed to conducting its business with honesty and integrity and we expect all staff to maintain high standards in accordance with our policies and procedures. This policy is designed to allow staff to disclose information that they believe shows malpractice, unethical conduct or illegal practices in the workplace, without being penalized in any way. This includes protecting staff from any detriment or discrimination if they do report improper or illegal conduct within the organization. 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 or to address them when they do occur.

This Policy Aims:

- To provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace
- To provide staff with guidance as to how to raise those concerns
- 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 and managed without fear of retaliation.
- To encourage all improper, unethical or inappropriate behavior to be identified and challenged at all levels of the organization;
- To ensure all employees feel supported in speaking up in confidence and reporting matters they suspect may involve anything, improper, unethical or inappropriate;
- To manage all disclosures in a timely, consistent and professional manner; and
- To reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

Definitions:

1. **Whistleblower** A Whistleblower is an employee who raises a concern about any wrongdoing, event or information about an actual, suspected or anticipated Reportable Matter. The Whistle blower is not expected to prove the truth of the allegation; but s/he needs to demonstrate sufficient grounds for concern and good faith.
2. **“Employee”**: "Employee" means a person who performs a service for wages or other remuneration under a contract of hire, written or oral, express or implied, for the district (temporary, trainee, part time employees / workers, full time consultants, holding permanent, honorary, voluntary or short-term positions. For the limited purpose of this policy term “Employee” includes vendor (Provides Goods)



3. **Reportable Matter:** Reportable Matter includes:
- a violation of a state, or municipal law, regulation,
 - Bribery or financial fraud
 - A criminal offence
 - Unethical conduct.
 - a danger to public health or safety; and/or
 - Damage to the environment
 - Negligence causing substantial and specific danger
 - gross mismanagement, substantial waste of funds, or a clear abuse of authority.
4. **Protected Disclosure** is a disclosure of information that the member of staff reasonably believes tends to show malpractice. As a member of staff, you are protected from suffering any detriment as a result of your 'disclosure'.

Principles

This policy offers guidance and protection to those members of staff who disclose a whistleblowing concern, GWC's aim is that the wellbeing of any member of staff should not in any way be harmed as a result of that protected disclosure, whether the item reported proves to be true or not, provided the reporting was carried out in good faith.

GWC undertakes to protect any member of staff from any personal claims and from any detriment, victimization, harassment or bullying as a result of their disclosure.

GWC undertakes to comply with all applicable laws relating to the prohibition of retaliation/revenge against good-faith whistleblowers who raise issues of concern.

This policy is not designed to support a member of staff who wishes to question financial or business decisions that have been taken by GWC.

Who does this policy apply to?

This policy applies to everyone who carries out work for the Company, including:

- Partners
- All employees
- Contractors and sub-contractors
- Agency staff
- Consultants
- other trainees

What is the whistleblowing

Whistleblowing is when a member of staff raises a concern relating to any of the matters above Officially this is called 'making a disclosure in the public interest, "The disclosure of information which relates to suspected wrongdoing (generally a breach of a legal, statutory or regulatory requirement or unethical, immoral behavior)".



Raising whistleblowing concerns

All whistleblowing disclosures will be treated as confidential and will be reported to the Ethics partner.

All whistleblowers should make it clear that they are making their disclosure within the terms of the Company's whistleblowing policy. This will ensure the recipient of the disclosure realizes this and takes the necessary action to investigate the disclosure and to protect the whistleblower's identity. GWC will then get in touch with whistleblower to discuss his/her concern. GWC will aim to keep Whistleblower informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent the company of giving the whistleblower specific details of the investigation or any disciplinary action taken as a result.

Whistleblower should treat any information about the investigation as confidential.

Confidentiality

It is an express term in the contract of employment, stating that an employee or member of staff will not disclose confidential information that concerns GWC. However, where a member of staff discovers information that they believe shows malpractice, unethical conduct or illegal practices within GWC, then the option to disclose the information independently of line management and without fear of reprisal for breach of confidentiality is made available under this Whistleblowing Policy.

GWC will treat all disclosures in a confidential and sensitive manner. As part of this, the identity of any member of staff making an allegation may be kept confidential so long as it does not hinder any investigation. However, the individual making the disclosure may need to provide a statement as part of the evidence gathering process and their identity may be revealed or implied as part of the investigating process.

If a criminal investigation follows, the member of staff may be needed as a witness. If this occurs, the HR Department will notify the member of staff at the earliest opportunity.

Protection and Support Whistleblowers

If one raises a concern under this Policy, he/she will not be at risk of suffering any form of reprisal or retaliation. Retaliation includes discrimination, reprisal, harassment or vengeance in any manner. Company's employee will not be at the risk of losing her/ his job or suffer loss in any other manner like transfer, demotion, refusal of promotion, or the like including any direct or indirect use of authority to obstruct the Whistleblowers' right to continue to perform his/her duties/functions including making further Protected Disclosure, as a result of reporting under this Policy. The protection is available provided that:

- a. The communication/ disclosure is made in good faith



- b. He /She reasonably believes that information and any allegations contained in it, are substantially true; and
- c. He/She is not acting for personal gain

Anyone who abuses the procedure (for example by maliciously raising a concern knowing it to be untrue) will be subject to disciplinary action, as will anyone who victimizes a colleague by raising a concern through this procedure. If considered appropriate or necessary, suitable legal actions may also be taken against such individuals.

However, no action will be taken against anyone who makes an allegation in good faith, reasonably believing it to be true, even if the allegation is not subsequently confirmed by the investigation.

Procedures for making a disclosure

- If a member of staff believes that a matter or practice within the scope of this policy is or has been taking place, they should make the disclosure immediately to their line manager. If the matter or practice is more serious and/or concerns the line manager, then it should be reported to their HR Department who will report it to the relevant senior management team member as appropriate, giving details of the protected disclosure, including:
 - Date and substance of the protected disclosure
 - Identity and level of seniority of the alleged wrongdoer(s)
 - Level of risk associated with the alleged wrongdoing.
- Exceptionally, if the member of staff believes it is inappropriate for any reason to report the concern to the HR team, they may report it to either the Chief Executive Officer or to Chief Audit Executive, or to one of the Trustees of GWC, the whistleblower can send his issue to whistleblowing@gwclogistics.com, which shall reach directly to the CAE who in his turn will issue his report after investigation to the Audit Committee.
- There is no specific method that staff should use to make a disclosure; they can use email, telephone to the anonymous line: [44218558](tel:44218558) or post.
- Audit Committee will decide whether sufficient information exists to allow the allegation(s) to be investigated to issue their Recommendation to the Board.

Anonymous or External disclosures

This policy encourages staff to put their name to any disclosure they make. Concerns expressed anonymously are less powerful and may be less easy to investigate; however, they will be considered and reviewed at GWC' discretion.

In exercising this discretion, the factors taken into account will include:

- The seriousness of the issues raised
- The credibility of the concern
- The likelihood of confirming the allegation from attributable sources



Staff who are concerned about possible reprisals if their identity is revealed should come forward to one of the contact points listed above of this policy and appropriate measures can then be taken to preserve confidentiality.

Who to contact?

- 1- CEO (Chief Executive Officer)
Email: Ranjeev.menon@gwclogistics.com
- 2- COO (Chief Operating Officer)
Email: Rajeswar.Govindan@gwclogistics.com
- 3- CAE (Chief Audit Executive)
Email: Segun.Abayomi@gwclogistics.com
- 4- Whistleblowing email:
Email: whistleblowing@gwclogistics.com

