

## AET Whistleblowing Policy

Name	Title	Signature	Date
Rajalingam Subramaniam	President & CEO		4-5-18
Karen Lawrie	Global Director of Legal		2-5-18



AET is committed to the highest standards of integrity, openness and accountability in the conduct of its business and operations. It aspires to conduct its affairs in an ethical, responsible and transparent manner.

Recognising the abovementioned values, AET provides an avenue for all employees of AET and members of the public to disclose any improper conduct within AET. Employees can disclose any improper conduct (misconduct or criminal offence) through AET's established whistleblowing channels.

Examples of the type of concerns which may be raised include:

- Health and safety risks
- Danger or damage to the environment by AET's vessels or otherwise
- Bribery, corruption, fraud or other criminal activity
- Financial misconduct by AET or any of our Employees
- Any breach of AET's legal or professional obligations
- Unauthorised disclosure of confidential information
- Any attempt to cover up wrongdoing

The above list is not exhaustive and includes any act or omission, which if proven, will constitute an act of misconduct under AET's Code of Conduct and Business Ethics (CoBE) or any criminal offence under relevant legislation at the material time.

Whistleblowing does not cover concerns or complaints about an Employee's own personal employment position or circumstances or the way they are treated at AET.

### **Protection for Whistleblowers**

AET is committed to ensuring that a whistleblower is accorded with protection of confidentiality of identity, to the extent reasonably practicable and in accordance to the relevant local legislation.

In addition, any employee who whistleblows internally will also be protected against any adverse or detrimental treatment for disclosing any improper conduct committed or about to be committed within AET provided that the disclosure is made in good faith. Such protection is accorded even if the investigation later reveals that the whistleblower was genuinely mistaken as to the facts of their disclosure.

### **Whistleblowing Channels**

1. Ship Master, Line Manager or Head of Department (in the first instance);
2. Human Resources or Legal Department; or
3. Confidential Reporting Hotline (if the employee, for any reason feels it is inappropriate to report to someone within AET).



### Whistleblowing Hotline

The hotline is provided by Safecall and offers an independent external reporting line, in your own language, where individuals can raise concerns about AET. Each call will be treated in complete confidence by skilled call handlers who are trained to receive reports relating to concerns in the workplace.

Individuals will be given the option of whether or not they would like their call to be anonymous, although AET does not encourage individuals to make anonymous disclosures as it may be more difficult or impossible to conduct a proper investigation if we cannot obtain further information from the individual reporting the wrongdoing.



The Safecall hotline is available **24 hours a day and 365 days a year** via the following details:

Via the Web: [www.safecall.co.uk/report](http://www.safecall.co.uk/report)

Send an email to: [aet-tankers@safecall.co.uk](mailto:aet-tankers@safecall.co.uk)

Contact the whistleblowing hotline on:

Country of Operation	Phone number
Brazil	0800 892 1750
India	000 800 4401256
Malaysia	1800 220 054
Singapore	800 4481773
UK	0800 9151571
USA	1 866 901 3295
World Wide (English Only)	+44 191 516 7749 (Chargeable)