

AET Whistleblowing Policy

Purpose:

AET are committed to conducting our business with honesty and integrity and to complying with high standards of corporate governance. However, all organisations face the risk of things going wrong from time to time. A culture of openness and accountability is essential in order to prevent such situations occurring and to address them when they do occur.

The aims of the whistleblowing policy and these guidelines are to encourage individuals to report suspected wrongdoing or dangers as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, that their confidentiality will be respected and without fear of reprisal in any form.

Scope:

The whistleblowing policy and these guidelines apply to all individuals working on shore and off shore at all levels and grades on behalf of any company within the AET Group without exception in any capacity whatsoever, including without limitation, the ELT, employees, consultants, contractors, trainees, homeworkers, part-time and fixed-term employees, casual and agency staff, and volunteers (collectively referred to as “Employees” throughout this policy).

This policy also applies to third parties who have a relationship with AET or who come into contact with AET Employees.

The policy and guidelines does not form part of any Employee's contract of employment and AET may amend it at any time.

1. What is whistleblowing?

Whistleblowing is the reporting of suspected wrongdoing or dangers by an individual in relation to AET's activities. 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
- breaches of AET's Code of Conduct and Business Ethics
- any attempt to cover up wrongdoing

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. Any such concerns or complaints should be raised through AET's Grievance Procedure.

2. What is AET's whistleblowing policy?

AET expects all Employees and suppliers to comply with AET's Code of Conduct and Business Ethics (COBE) and international and local laws and guidelines. Non-compliance or malpractice by Employees or suppliers is unacceptable and will be taken very seriously by AET.

In the event that an individual becomes aware of a wrongdoing within AET they are expected to report it as soon as possible and in accordance with the procedure set out in this policy.

It is AET's policy to support and protect any Employee who makes a report in accordance with this policy and to fully investigate reports in a timely manner.

3. Whistleblowing procedure for AET Employees

If an Employee has any concerns about wrongdoing, dangers or malpractice that they would like to raise, they should speak to the Ship Master, their Line Manager or the Head of Department in the first instance.

If, for any reason, an Employee feels unable to raise the matter with one of these people they may refer the matter to the Human Resources or Legal Department.

If it is not appropriate to report the matter directly to someone within AET, then Employees may use the confidential reporting hotline (details below).

4. Whistleblowing Hotline

The hotline is provided by Safecall and offers an independent external reporting line, in your own language, where you 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. You will be given the option of whether or not you would like your call to be anonymous.



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
- ✓ **Send an email to:** 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)



5. Confidentiality

AET hopes that Employees will feel able to voice whistleblowing reports openly under this policy. However, if an Employee wishes to raise their concern confidentially, AET will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

AET does not encourage individuals to make disclosures anonymously. It may be more difficult or impossible to conduct a proper investigation if we cannot obtain further information from the individual reporting the wrongdoing. It is also more difficult to establish whether any allegations are credible. Those individuals reporting under this procedure who are concerned about possible reprisals if their identity is revealed should raise their concerns with Legal Department and appropriate measures can then be taken to preserve confidentiality.

6. What will AET do with a report

Once an individual has raised a concern, an initial summary of the disclosure will be given to the Global Director Legal, Compliance Specialist and the SVP HR. If the disclosure relates to the Legal and Secretariat function, the report will be provided to the SVP HR only. If the disclosure relates to the HR function, the report will be provided to the Global Director Legal and Compliance Specialist only.

If the disclosure relates to an ELT member or the CEO then the summary will be provided to the Chairman of the Audit and Risk Committee (“ARMC”) and any resulting assessment and investigation will be handled directly by the ARMC.

On receipt of a disclosure notification, the Compliance Specialist (or HR representative in the event of a conflict of interest) will carry out an initial assessment to evaluate possible wrongdoing. If the initial investigation finds possible wrongdoing, the AET Whistleblowing Committee (the “Committee”) will be convened.

The Committee will review and consider the disclosure and initial assessment and determine how it should be investigated. In some cases AET may appoint an investigator or team of investigators including other Employees with relevant experience of investigations or specialist knowledge of the subject matter.

The individual making the report may be required to attend additional meetings in order to provide further information. The co-operation of individuals is essential in conducting a proper investigation. If a report has been made anonymously, it will be investigated as far as can be in accordance with this procedure.

Following completion of the investigation, the Committee will be reconvened to hear the investigation findings. The Committee will subsequently determine what remedial action (if any) must be taken. The Committee may appoint a team of Employees to assist in carrying out any remedial action.

If at any time during an investigation it becomes apparent that a member of the Committee or investigation team is conflicted due to the nature of the disclosure, they will be asked to excuse themselves immediately for the duration of the investigation and the determination process.



If the Committee has any disagreement relating to the investigation or the outcome, the matter will be referred to the ARMC for guidance or determination. The decision of the ARMC is final.

AET will aim to keep individuals informed of the progress of the investigation. Once the matter has been investigated you will be provided with a written report of the findings. However, the need for confidentiality may prevent AET giving individuals specific details of the investigation or any disciplinary action taken as a result.

Any Employee involved in an investigation in any capacity must treat any information received as confidential.

AET cannot guarantee the outcome an individual is seeking, however AET will seek to deal with your concern fairly and in an appropriate way. You may appeal any decision of the Committee to the ARMC, whose decision will be final and binding.

7. Protection for Whistleblowers

An Employee is not required to prove any concerns raised under this policy. An honest and reasonable suspicion that malpractice has been or is likely to be committed is sufficient. Provided an Employee is acting honestly and reasonably, it does not matter if they are mistaken about their concern.

AET is committed to ensuring that any individual making a report under this policy is protected in accordance to the relevant local legislation and does not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment may include dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If an Employee believes that they have suffered any such treatment, they should inform the Legal Department immediately. If the matter is not remedied the Employee should raise it formally using AET's Grievance Procedure.

Employees must not threaten or retaliate against whistleblowers in any way. If an Employee is found to be involved in such conduct they may be subject to disciplinary action, up to and including dismissal.

If following investigation AET concludes that an Employee has made false allegations maliciously or not in good faith, the Employee may be subject to disciplinary action.

8. Audit Committee Review of Reports

A summary of reports received under this policy will be communicated to the ARMC on a quarterly basis (or a more frequent basis should conditions warrant more timely action).

9. Cross Reference

- AET Disciplinary Policy