



“Whistleblowing” Policy

The “Whistleblowing” policy has been introduced to help you raise your concerns about malpractice at an early stage and in the right way.

If you have any concern about malpractice and feel unable to raise them with your line manager, you can contact:

**Tim Smith – Chief Executive Officer /
The AFE Group Company Secretary**

Tel:01553 817585

Email: Info@theafegroup.com

Email: t.smith@theafegroup.com



Policy Statement

The AFE Group has a reputation for high standards in all that we do. Honesty, accountability and transparency are crucial to our business success.

To this end all colleagues are encouraged to raise any genuine concerns about malpractice or unlawful conduct, which they suspect, is taking place at work.

These may include matters of:

- Financial malpractice or impropriety or fraud.
- Failure to comply with legal obligations or statutes
- Danger to Health, Safety or the environment
- Criminal activity or corruption
- Improper conduct or unethical behaviour, blackmail or bribery
- Attempts to conceal any such information regarding these matters

Colleagues should first seek to address any matters through your immediate reporting lines and company grievance procedure.

No one raising a genuine concern will face harassment or victimisation.

The 'Whistleblowing' policy applies to permanent, part time and temporary colleagues in the work place.

Guide for Colleagues

Where concerns arise, you will always be encouraged to raise these with your supervisor or line manager for resolution. This process will normally be all that is required to achieve a satisfactory outcome. You should always look to follow your business unit's dispute and grievance procedure.

However, there may be an exceptional occasion when you feel unable to discuss an issue in this way. The 'Whistleblowing' policy is designed to cater for such circumstances, and is a simple way for you to raise any work-based concerns. The AFE Group wants to know about any unlawful conduct, financial malpractice or dangers to the public or the environment that may be occurring.

For exceptional circumstances where you cannot discuss the issue with your line manager, you can talk to the Group Managing Director, Tim Smith. Your call will be answered in an understanding, professional and confidential manner.

This policy applies to all AFE UK units and their overseas subsidiaries.

Why have a 'Whistleblowing' policy?

The 'Whistleblowing' policy has been introduced to help you raise your concerns about malpractice at an early stage and in the right way.

Questions & Answers

We recognise that you may be worried about raising such issues or may want to keep the concern to yourself. We assure you that, by using this procedure, your concern will be dealt with effectively, discretely and, if you wish, in confidence.

How do I raise a concern?

1. AFE Group Ltd

If you have a concern about malpractice, we hope you will feel able to raise it with your line manager. However, if this is inappropriate, you can contact:

Tim Smith Chief Executive Officer
Tel: 01553 817585
Email: t.smith@theafegroup.com

2. Ali Group Srl

AFE Group Ltd is a subsidiary company of Ali Group Srl. Ali Group also provides a whistleblowing platform that allows colleagues from any of the group's worldwide companies to quickly and easily report concerns about actual or suspected misconduct that can affect our company or the wellbeing of people.

You can access the Ali Group confidential whistleblowing platform at the following dedicated and secure website

www.gruppoali.integrityline.com

Do I have to give my name?

No. You may raise a concern in confidence under this policy.

However, if you do not tell us who you are, it will be much more difficult for us to look further into the matter, to protect your position or to give you feedback. AFE will not tolerate harassment or victimisation of anyone raising a genuine concern.

If I blow the whistle and give my name could I get into trouble?

If you raise a genuine concern under this policy, you will not be at risk of losing your job or suffering any form of retribution as a result.

As long as you are acting in good faith, it does not matter if you are mistaken.

However, if you maliciously raise a matter that you know to be untrue, this could result in disciplinary action.

What if I am implicated?

AFE will protect you from victimisation in respect of the disclosure, but we cannot give you immunity.

**SPEAK TO YOUR LINE
MANAGER OR SUPERVISOR
FIRST**