

12.29 Whistle-blowing Policy

12.29.1 Purpose

The Board of Directors is committed to the highest possible standards of openness, integrity and accountability. In line with that commitment we encourage employees, and others that we deal with, who have concerns about any aspect which involves malpractices or unethical issues, to come forward and voice out those concerns.

12.29.2 Applicability

The current policy applies to all employees (including those designated as casual employees). It also covers suppliers, contractors, crew members and those providing services under a contract. This policy also covers Directors and Board members.

12.29.3 Elaboration

12.29.3.1 Definition

Whistle blowing encourages and enables employees to safely raise serious concerns within the Group rather than overlooking a problem or “blowing the whistle outside”. Employees are often the first to realise that there is something wrong happening within the Group. However, they may not express their concerns as they feel that voicing out would be disloyal to their colleagues or to the Board, or might be misunderstood or misinterpreted.

12.29.3.2 Aims of the policy

a.	To encourage you to feel confident regarding raising concerns and to encourage you to question and report unethical practices.
b.	To provide avenues for you to raise concerns in confidence and receive feedback on any action taken.
c.	To ensure that you receive a response to your concerns and that you are aware of how to pursue them if you are not satisfied.
d.	To reassure you that you will be protected from possible reprisals or victimisation if you have a reasonable belief that you have made a truthful disclosure.

12.29.3.3 Types of Concern

What types of concerns are covered by our Whistle Blowing Policy?

a.	A conduct that is an offence or a breach of law.
b.	Failure to comply with a legal obligation.
c.	Health and safety risks, including risks to the public as well as to other employees.
d.	Damage to the environment.
e.	Sexual, physical, moral or other abuse of employees or clients.
f.	Other unethical conduct in breach of our Code of Ethics.
g.	Actions which are unprofessional or inappropriate or which conflict with a general understanding of what is right or wrong.
Note:	Other procedures are available to employees through the Employee HR Manual, e.g. grievance procedures which relate to complaints about your own employment. The current policy does not replace other internal procedures already in use within the Group.

12.29.3.4 Safeguards and victimisation

The Board of Directors recognizes that the decision to report a concern can be a difficult one to make. If you reasonably believe, based on what you know, that what you are saying is true, you should have nothing to fear because you would then be doing your duty to your employer and those on whose behalf you provide a service.

The Board of Directors will not tolerate any harassment or victimisation (including informal pressures) and will take appropriate action to protect you whenever you raise a concern in good faith.

12.29.3.5 Confidentiality

All concerns will be treated in the strictest confidence. The current policy encourages you to put your name to your concern whenever possible, however anonymous concerns will be investigated. Please ensure all details of the concerns are provided when making a report.

Please note that:

a.	employees must have a reasonable belief that the information they are reporting is true,
b.	employees must not make knowingly false allegations, employees must not seek any personal gain.

12.29.3.6 How to raise a concern?

As a first step, you should normally raise concerns with your immediate supervisor/manager or their superior.

The Whistle-blower should exhaust all internal channels/means when raising such a concern.

This may also depend, however, on the seriousness and severity of the issues involved and who is suspected of the malpractice. For example, if you believe that your immediate management is involved, you should approach a more senior level of management, e.g.: HR and Legal Advisor or the Group Corporate Governance, Compliance and Risk Officer.

Please note: It is important to give precise details regarding your concern as well as your company and department. If you wish to remain anonymous when raising a concern, please report the incident by using the Air-Tec Global Whistle blowing Reporting Form that gives you the option to remain anonymous. The form can be found on the Groups website under the corporate governance section. By using this form, Air-Tec guarantees that the reporter will remain anonymous to the Company. Depending on the severity and complexity of the relevant concern, the Company may initiate a formal investigation. This investigation may be time consuming and thus feedback to the Whistle-blower (if chosen to not remain anonymous) in regards to the concern raised, may be deferred up until such stage that the investigation has been fully completed.

12.29.3.7 Possible outcomes after reporting a concern

There will be no adverse consequences for anyone who reports a whistle blowing concern according to this policy, provided such person has not been directly and or indirectly involved in the particular form of unlawful/unethical conduct or has benefited from such conduct, in whichever way. Should a Whistle-blower be involved in such conduct whether directly or indirectly or have benefited from such, the act of whistle-blowing does not excuse the whistle-blower from any form of liability. It may however, be taken into account as mitigation when deciding as to what remedial action/punishment is to be imposed.

However, any employee found responsible for making allegation that is knowingly false may be subject to disciplinary action.

The following actions may be taken after investigation of the concern:

a.	disciplinary action (up to and including dismissal) against the wrongdoer dependent on the results of the investigation; or
b.	disciplinary action (up to and including dismissal) against the whistle-blower, if the information disclosed is knowingly false.

No action will be taken against an employee who makes an inaccurate disclosure as the result of an honest error. No action will be taken against an accused person if an allegation is shown to be unfounded. The whistle-blower may be kept informed of progress and of the outcome of the investigation, and will have the opportunity to provide additional information if he/she so wishes, within the constraints of maintaining confidentiality and observing legal restrictions generally.

End of Chapter