

ACL Cables PLC - Whistleblowing policy

1. What is Whistleblowing?

In this policy “Whistleblowing” means the reporting by employees of suspected misconduct, illegal acts or failure to act according to ACL Cables PLC way. This policy aims to encourage employees and others who have serious concerns about any aspect of ACL Cables PLC to come forward and voice those concerns.

Employees are often the first to realize that there may be something seriously wrong within ACL Cables PLC. ‘Whistleblowing’ is viewed by ACL Cables PLC as a positive act that can make a valuable contribution to the efficiency and long-term success of ACL Cables PLC. It is not disloyal to colleagues or ACL Cables PLC to speak up. ACL Cables PLC is committed to achieving the highest possible standards of service and the highest possible ethical standards in public life and all of its practices.

2. What is the aim of the Policy and when does it apply?

2.1. Aims of the Policy

This Policy aims to;

- Encourage you to feel confident in raising serious concerns at the earliest opportunity and to question and act upon concerns about the practice.
- Provide avenues for you to raise those concerns and receive feedback on any action taken.
- Ensure that you receive a response to your concerns and that you are aware of how to pursue them if you are not satisfied.
- Reassure you that you will be protected from possible reprisals or victimization if you have made any disclosure in good faith.

2.2. What should be reported?

Any serious concerns that you have about service provision or the conduct of officers or members of ACL Cables PLC or others acting on behalf of ACL Cables PLC. These may relate to;

- Conduct which is an offense or a breach of the law (Eg. when a criminal offense has been committed or failing to comply with any other legal obligation)
- Disclosures related to miscarriages of justice
- Racial, sexual, disability, or other discrimination
- Health and safety of the public and/or other employees
- Damage to the environment
- Unauthorized use of company funds or other assets
- Possible fraud and corruption
- Neglect or abuse of clients/supplier's other members of the society
- Other unethical conduct

2.3. Things that are not covered under the scope

The Policy is not intended to replace the following procedures;

- If your concern relates to your own treatment as an employee, you should raise it under the existing grievance or harassment procedures
- If a client has a concern about services provided to him/her, it should be raised as a complaint to the Company.

3. Protecting the Whistleblower

3.1. Harassment or Victimization

ACL Cables PLC recognizes that the decision to report a concern can be a difficult one to make. If you honestly and reasonably believe what you are saying is true, you should have nothing to fear because you will be doing your duty to your employer, your colleagues and those for whom you are providing a service.

ACL Cables PLC will not tolerate any harassment or victimization of a whistleblower (including informal pressures) and will take appropriate action to protect you when you raise a concern in good faith and will treat this as a serious disciplinary offense which will be dealt with under the disciplinary rules, and procedure.

3.2. Confidentiality

All concerns will be treated in confidence and every effort will be made not to reveal your identity if that is your wish. If disciplinary or other proceedings follow the investigation, it may not be possible to take action as a result of your disclosure without your help, so you may be asked to come forward as a witness. If you agree to this, you will be offered advice and support.

3.3. Anonymous Allegations

This Policy encourages you to put your name to your allegation whenever possible. If you do not tell us who you are it will be much more difficult for us to protect your position or to give you feedback.

Concerns expressed anonymously are much less powerful but they may be considered depending on;

- The seriousness of the issue raised
- The credibility of the concern, and
- The likelihood of confirming the allegation from other source

3.4. Untrue Allegations

If you make an allegation in good faith and reasonably believing it to be true, but it is not confirmed by the investigation, the Company will recognize your concern

and you have nothing to fear. If, however, you make an allegation frivolously, maliciously, or for personal gain, appropriate action that could include disciplinary action, may be taken.

4. Raising a Concern

ACL Cables PLC belief that an employee who has a concern should first raise such concerns with the manager of such an employee. If an employee feels that the concern relates to a matter which cannot be adequately addressed by such manager, he or she may choose to make direct contact with the persons whose names appear below.

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