

Policy

This company encourages a free and open culture in its dealings between its employees and all people with whom it engages in business and legal relations. In particular the company recognises that effective and honest communication is essential if malpractice is to be effectively dealt with and the company's success ensured. This policy is designed to provide guidance to all those who work with, or within the company who may feel, from time to time, that they need to raise certain issues (particularly in the public interest) relating to the company with someone in confidence.

There are existing procedures in place to enable you to lodge a grievance relating to your own employment. This Whistleblowing Policy is intended to cover concerns that fall outside the scope of this procedure.

The policy will apply where a disclosure is made in good faith and where you reasonably believe that the information disclosed, and any allegation contained in it, are substantially true and are in the public's interest.

Procedure

This policy will apply in cases where you genuinely, and in good faith, believe that one of the following sets of circumstances is occurring, has occurred, or may occur within the company and it is in the public's interest that this type of disclosure is made:

- the carrying out of a criminal offence
- failure to comply with any legal obligation to which a person is subject
- the occurrence of a miscarriage of justice
- the endangering of an individual's health and safety
- risk or actual damage to the environment
- the concealing of information relating to the above.

These acts can be in the past, present or future, so that, for example, a disclosure qualifies if it relates to environmental damage that has happened, is happening, or is likely to happen. The Company will take any concerns that you may raise relating to the above matters very seriously.

Employees must reasonably believe that the disclosure is "in the public interest". We encourage you to use the procedure to raise any such concerns.

Personal grievances (e.g. bullying, harassment, discrimination) aren't covered by the Whistleblowing law, unless your particular case is in the public interest. Therefore, complaints of these types, don't count as whistleblowing. Factors of this nature should be reported via the company's grievance policy.

Process – how to raise a concern

As a first step, you should normally raise concerns with your immediate manager or their superior. This depends, however, on the seriousness and sensitivity of the issues involved and who is thought to be involved in the malpractice. If you do not feel that this is a suitable course of action, then you should contact the HR Department (in the first instance the HR Manager).

Concerns are better raised in writing. You are invited to set out the background and history of the concern, giving names, dates and places where possible, and the reasons why you are particularly concerned about the situation. If you do not feel able to put your concern in writing, you can telephone or meet the appropriate manager/ director.

The earlier you express the concern, the easier it is to take action.

Although you are not expected to prove the truth of an allegation, you will need to demonstrate to the person contacted that there are sufficient grounds for your concern. *Please note, that while it is not necessary that you prove the malpractice or misconduct that you are alleging, you must believe you have facts to support your suspicions. You will not be protected from the consequences of making such a disclosure if there is no factual evidence or it has not been made in good faith.*

If you reasonably believe that one of the above circumstances relates to a person other than your employer, or that someone other than the Company has legal responsibility, then you should make that disclosure to that other person.

Procedure

Following receipt of a disclosure made under this policy, an investigation meeting will be held with the employee. The purpose of this meeting is to gather as much information as possible from the employee regarding their concerns, including whether they have any supporting evidence or can identify any witnesses. This meeting will be held ideally within 4 weeks following receipt of the disclosure.

After this meeting, the investigating manager will commence a full investigation into the concerns raised. The investigation will aim to gather all relevant information including relevant documentary evidence or witness statements. This investigation must be completed within 4 weeks following receipt of the disclosure during the formal meeting. If this is not possible, the investigating manager will speak to the employee in advance of the completion deadline to agree an extended period of investigation.

Once the investigation is complete, the investigation manager will write to the employee confirming the outcome.

If despite the best efforts of the Company, you believe that disclosure within the Company is inappropriate or has been unsuccessful, then you may wish to make a disclosure to a third party/ legal advisor/ official organisation or regulatory body. Disclosures made to your legal adviser, in the course of obtaining legal advice, will be protected. Alternatively, employees may raise a formal complaint under the Company's grievance policy.

Formal Action

Should formal action be required as a result of any disclosure made under this policy, this action will be carried out in accordance with the applicable internal policy. Any potential sanctions imposed will be fair and reasonable in line with the relevant policy.

Protection and confidentiality

If any disclosure is made to cause disruption within the Company, made maliciously, or concerns information that you do not substantially believe is true, in bad faith or is made for personal gain, then such a disclosure will constitute a disciplinary offence for the purposes of the Company's Disciplinary Policy and Procedures and may constitute gross misconduct, for which summary dismissal is the sanction.

If requested, as a whistle-blower, you will be protected. There may be circumstances, however, where it will not be possible to proceed without revealing your identity, for example if your evidence is needed in the investigatory process, at a disciplinary or court hearing. Should this be the case, the matter will be discussed with you at the earliest opportunity

You, as the whistle-blower, should treat any information about the investigation as confidential. Appropriate steps will be taken to ensure that your working environment and/ or working relationships are not prejudiced by the fact of your disclosure.

All employees who raise matters of concern under this policy are protected against detrimental treatment, up to and including dismissal, because they have made a disclosure.

Bullying, harassment or any other detrimental treatment afforded to a colleague who has made a qualifying disclosure is unacceptable. Anyone found to have acted in such a manner will be subject to disciplinary action.

The Company hopes that such disclosures will never be necessary within its organisation, it also recognises that it may find itself in circumstances, which are new to it.

Each case will be treated on its own merits.

Review of procedure

This policy was reviewed on the date referred to below. The company will endeavour to review the detailed within and the process/ procedure undertaken by the company on an annual basis.



Chairman – Vital Energi Group of Companies

28th February 2022



CEO – Vital Energi Group of Companies

28th February 2022