



Whistleblowing Policy

AUTHORISATION		
	Name / Function	Date
Approved	Board	22 October 2015
Approved:	Board	5 April 2017
Approved:	Board	4 December 2018



Whistleblowing Policy

We and our subsidiary companies are committed to the highest standards of quality, honesty, openness and accountability.

As an employee you have an important role in achieving this goal. Employees will usually be the first to know when someone in the organisation is doing something illegal or improper but often feel worried about voicing their concerns. We have come up with a policy and procedure to cover the reporting of any genuine concerns you may have about suspected misconduct within the organisation. Your employing company may well have a whistle blowing policy of its own and you are encouraged to use this. If this is not the case or you have concerns about raising your issues at that level you are free to use the Gulf Keystone Group policy.

The policy is intended to conform to the guidance in the Public Interest Disclosure Act 1998 (PIDA). PIDA encourages you to raise concerns internally in the first instance.

This policy applies to all permanent and short term employees of the Group. It also applies to external consultants, contractors and agency staff whilst working within the Group.

It is impossible to give an exhaustive list of the activities that constitute misconduct or malpractice but, broadly speaking we would expect you to report the following:

- Criminal offences
- Failure to comply with legal obligations
- Actions which endanger the health or safety of employees or the public
- Actions which cause damage to the environment
- Actions which are intended to conceal any of the above

The policy is primarily for concerns where the interests of others or of the organisation itself are at risk. If in doubt – raise it!

YOUR CONFIDENCE

Gulf Keystone is committed to this policy. 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 or



harassment as a result. Providing you are acting in good faith, it does not matter if you are mistaken. This policy does not, however, extend to anyone who maliciously raises a concern that they know is untrue.

Regardless of the above assurance, we understand that you may still want to raise a concern in confidence under this policy. If you ask us to protect your identity by keeping your confidence, we will not disclose it without your consent. But you should remember that if you do not tell us who you are, it will be much more difficult for us to investigate your concern or to give you feedback.

HOW TO RAISE A CONCERN INTERNALLY

We hope that, in the first instance, you will feel able to raise a concern with your direct line manager. You can do this in writing or, if you prefer, you can telephone your manager.

If, for whatever reason, you feel you cannot speak with your manager about your concern or if you think your concern has not been handled properly, then you should contact the Company Chairman, Jaap Huijskes, by email at: jhuijskes@gulfkeystone.co.uk, whom failing, the Chairman of the Audit and Risk Committee, Garrett Soden, by email at: gsoden@gulfkeystone.co.uk.

Alternatively, you may contact an independent service provider, Expolink, on the following contact details:

Online: wrs.expolink.co.uk/gkp

Email: gkp@expolink.co.uk

Smartphone: SpeakingUp App, access code gulfkeystone

Remember, we can deal with your concern even if you prefer to remain anonymous, but as mentioned before, this will make the investigation and giving you feedback much harder.

HOW WE WILL HANDLE THE MATTER

Once you have told us of your concern, we will look into it carefully and thoroughly to assess what action, if any, should be taken. Depending on the nature of your concern, this may mean an internal inquiry or a more formal investigation. We will tell you who



your point of contact will be and whether we will need further assistance from you. We may ask you how you think your concern should be best dealt with. If you have a personal interest in the matter, we would ask that you tell us at the outset. Whilst we will try to give you as much feedback as possible, we may not be able to give you specific details as this could infringe upon the privacy of another individual.

We cannot guarantee that we will respond to all concerns in the way that you might wish, but we will try to handle the matter fairly and properly. By using this policy, or the policy of your employing company, you will help us to achieve this.

EXTERNAL CONTACTS

The rules and regulations set out in the Handling Business Information Policy and Employee Handbook require that you do not disclose confidential, false or misleading information. In considering taking a concern outside the Group, you should be aware of your duty of confidentiality and you should consider whether reporting the concern externally, without first giving the Group the opportunity to look into the matter, is the reasonable course of action.

We hope this policy gives you the reassurances you need to raise concerns internally, but if you still feel uneasy, we would rather you raised a concern with the appropriate regulator than not at all. Provided you are acting in good faith and you have evidence to back up your concerns, you can also contact:

- UKLA
- Financial Conduct Authority
- Office of Fair Trading

MONITORING THE POLICY

Confidential records will be kept of all matters raised through this policy and the appropriate committee will receive reports with an assessment of the effectiveness of the policy.

Approved by the Board on 4 December 2018