

Whistle Blowing

Whistleblowing Procedure

AP&T Group is committed to maintaining the highest standards of honesty, openness and accountability and therefor takes all misconduct very seriously, whether it is committed by Staff or Associated Persons.

This document sets out a procedure by which you can report any concerns and feel confident that you will not be liable to disciplinary action.

On the other hand, if you deliberately would make a false report for personal reasons or otherwise seek to abuse this procedure, then you may face serious disciplinary action.

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

1. What sort of activities should I report using this procedure?

We would expect you to report any activities that constitute malpractice, like for example:

- a. Criminal offences or failure to comply with legal obligations
- b. Miscarriages of justice
- c. Actions which endanger the health or safety of Staff or the public
- d. Actions harmful to the business
- e. Bribery, inappropriate/excessive gratuities or other unethical issues
- f. Requests to take part in fraudulent behaviour
- g. Actions which cause damage to the environment
- h. Actions that offend, discriminate against or alienate any Staff or business contacts
- i. Actions which are intended to conceal any of the above

If it is not clear that a particular action falls within one of these categories you will need to use your own judgement, but in principle it is better to report than to keep it to yourself.

2. How do I make a report?

You can make a report orally or in writing to either:

- a. Your line manager (or his or her manager)
- b. AP&T Human Resources
- c. The AP&T assigned responsible person for CSR/Sustainability issues

If you do not feel confident in reporting to either of these, you can report anonymously using address: <https://report.whistleb.com/aptgroup>, which is a service handled by a third party. The report will then be handled by a competent person appointed by the Group.

If you so wish, we will keep your identity secret. However, if your report leads to a criminal investigation, you may be needed as a witness. Should this be the case we will discuss the matter with you at the earliest opportunity.

3. How will my report be investigated?

If preliminary enquiries show that a full investigation is necessary, we will either, depending on the nature of the misconduct, investigate internally within AP&T Group or refer to the appropriate external person for investigation. We will inform you of the outcome of the preliminary enquiries and any further action that has been taken. If you are unhappy with the outcome of an investigation we would prefer that you submit another report explaining why this is the case. If there are good reasons, your concern will be investigated again. If you think the concern still remains, you should raise the matter with the appropriate official organization or regulatory body.