



Introduction

Bibby Line Group and all its businesses, including Bibby Marine Management, encourages an open culture between its employees and all people with whom it engages in business and legal relations. The Company recognises that effective and honest communication is essential if malpractice is to be effectively dealt with.

Whistleblowing is the disclosure of information about the wrongful, unlawful or dishonest activities of your employer or work colleagues to your employer (or a relevant authority if the initial response from within the business is considered insufficient) and which is in the public interest. We support any individuals raising concerns in good faith about inappropriate practices within the business.

This Policy provides a mechanism for employees to raise serious concerns about wrongdoing and get feedback on any actions taken as a result.

Employees who whistleblow are protected by the law (the Public Interest Disclosure Act 1998) and the Company shall ensure that employees who make a genuine disclosure in good faith and follow the reporting process set out below shall suffer no detriment to their employment conditions as a result.

Scope of policy

This policy is designed to enable employees of the Company to raise concerns internally and to a high level and to disclose information which the individual believes shows malpractice or impropriety and is in the public interest. Such concerns could include, but are not limited to:

- financial irregularities (malpractice, theft, impropriety or fraud);
- giving or receiving bribes ('backhanders', 'kickbacks' or improper payments to officials);
- a breach, or a potential breach, of a legal obligation (for example, health & safety legislation);
- unsafe practices, putting the public or colleagues in danger;
- harassment of a colleague, customer or other individual;
- damage to the environment;
- committing of a criminal offence;
- improper conduct or unethical behaviour;
- slavery, servitude, forced compulsory labour or human trafficking; and
- attempts to conceal any of these.

This policy is to be used in situations where you feel unable to raise the issue with the relevant line manager who should normally be the first port of call to resolve the situation, or you have done so and it has not been resolved satisfactorily.

If you know, or suspect, that some wrongdoing is taking place within the organisation, you should raise the matter immediately with your Line Manager or the HR department. You are encouraged to submit reports of violations of company values, policies and procedures, unsafe working practices or anything that you may feel is wrong.



If you feel unable to raise the issue with your Line Manager or HR then you should raise the matter with the *most appropriate* person from the following options:

- another manager within your business;
- a director of your business;
- a member of the internal audit team at Bibby Line Group; or
- an Executive director at Bibby Line Group.

In the (hopefully unlikely) event that you feel unable to raise the issue with any of the above then please raise the issue with the Chairman of Bibby Line Group, Paul Drechsler, or the Chairman of the Bibby Line Group Audit Committee, David Anderson.

For contact details of the relevant individuals please refer to Appendix 1 of this Policy.

Independent whistleblowing hotline

You can also raise an issue via the BLG Whistleblowing Hotline, which is operated by Navex Global, a company independent of Bibby Line Group. The hotline covers all companies that are part of Bibby Line Group.

In most cases, you can expect your company's own policies and procedures to ensure your case is dealt with properly and fairly and you are encouraged to follow the processes set out in your company's relevant policy first, before using the hotline to report an issue or concern.

Accessing the hotline will also give you the opportunity to remain anonymous if you choose to do so. The service operated by Navex Global allows for reports to be submitted either via a dedicated website (www.blghotline.ethicspoint.com) or via a dedicated telephone hotline from any location where Bibby Line Group companies operate. You can find the relevant access numbers on the main page of the BLG Whistleblowing Hotline website.

All issues raised via this hotline will be reviewed and investigated (if appropriate) by a designated representative of the company to which the issue relates (this will be somebody who is independent of anybody implicated in your report). Where an issue submitted via the hotline is identified to have already been reviewed and dealt with internally by the company, this issue will be referred to and reviewed by Bibby Line Group for further action, if deemed necessary.

A response and/or a progress update (where appropriate) will be provided against each issue submitted through the hotline and you will be able to view the company's response by using the case ID and password facility provided by Navex Global.

Untrue allegations

When making the disclosure you should take care to ensure the accuracy of the information. Although it is appreciated that where you have suspicions of wrongdoing you may not have full details it is expected that you genuinely believe your concerns to be true and you are raising them in good faith. Employees should give careful consideration and may choose to take advice from the HR department prior to making a disclosure.



The Company will not progress any matter in relation to untrue disclosures.

If it can be shown that the employee who raised the disclosure has done so vexatiously, mischievously, maliciously or for personal gain (i.e. in bad faith), disciplinary action may be taken.

Making disclosures to third parties

If you are not satisfied with the Company's response after making a disclosure and you have raised the issue at the highest level as outlined above, you are entitled under the Act to contact a relevant external body to express your concerns.

In doing this you should:

- have a reasonable belief that the disclosure is based on correct facts;
- not be making any personal gain from the disclosure; and
- make the disclosure to a relevant body.

Whilst we support your rights to make such a disclosure externally we would not expect this to occur without you having raised the issue *more than once internally*.

A "relevant body" is likely to be a regulatory body (for example, the Health & Safety Executive, the Financial Services Authority or the Police).

A list of possible "relevant bodies" and their contact information is included in Appendix 2 of this Policy.

Contacting the media

The media is *not* a relevant external body (this includes all social media sources) – see the section above about 'Making disclosures to third parties' for the situations where it is appropriate to raise the issues outside the Company.

Employees should not contact the media or add comments to any social media platforms with allegations about the Company. If you do so you may be subject to disciplinary action.

Actions to be taken by the Company

Confidentiality

Bibby Line Group and all its businesses, including Bibby Marine Management, will treat all disclosures made following the process set out above in a confidential and sensitive manner. The identity of the individual making the allegation may be kept confidential so long as it does not hinder or frustrate any investigation. However, the investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence required.

Anonymous disclosures

We encourage you to put your name to any disclosures you make; however, you have the option of submitting an anonymous report via the independently-operated BLG Whistleblowing Hotline.



The factors the company will take into account when considering anonymous reports will include:

- The seriousness of the issues raised;
- The credibility of the concern; and
- The likelihood of confirming the allegation from attributable sources.

Investigating procedure

Upon receipt of a whistleblowing disclosure or complaint, the Company will appoint an investigating officer (who may be a member of the internal audit team), who will be expected to follow these steps:

- Obtain full details and clarifications of the complaint.
- The investigating officer should inform the member of staff against whom the complaint is made as soon as is practically possible, subject to the limitations of not compromising any investigation. The member of staff will be informed of their right to be accompanied by a trade union or other representative at any future interview or hearing held under the provision of these procedures.
- The investigating officer should consider the involvement of the Company auditors and/or (should there be suspected criminal or potentially criminal activity) the Police at this stage, and should consult with the BLG Managing Director and BLG Chairman as appropriate.
- The allegations should be fully investigated by the investigating officer with the assistance where appropriate, of other individuals / bodies.
- A judgement concerning the complaint and validity of the complaint will be made by the investigating officer. This judgement will be detailed in a written report containing the findings of the investigations and reasons for the judgement. The report will be reviewed by the appropriate senior management and internal audit, and may be passed to the BLG Managing Director and BLG Chairman if appropriate.
- The senior management responsible for the investigation, including if appropriate the BLG Managing Director and BLG Chairman, will decide what action to take.
- The complainant should be kept informed of the progress of the investigations and, if appropriate, of the final outcome.
- If appropriate, a copy of the outcomes will be passed to the external Auditors to enable a review of the procedures.

Timescales

Due to the varied nature of these sorts of complaints, which may involve internal investigators and / or the police, it is not possible to lay down precise timescales for such investigations. The investigating officer should ensure that the investigations are undertaken as quickly as possible without affecting the quality and depth of those investigations.

The investigating officer, should as soon as practically possible, send a written acknowledgement of the concern to the complainant and thereafter report back to them in writing the outcome of the investigation and on the action that is proposed. If the investigation is a prolonged one, the investigating officer should keep the complainant informed, in writing, as to the progress of the investigation and as to when it is likely to be concluded.

All responses to the complainant should be in writing and sent to their home address unless otherwise agreed with them.



Where the initial concern raised is submitted anonymously and logged via the BLG Whistleblowing Hotline, the investigating officer should submit a progress update and, at a later stage, the final outcome, against the case reference recorded in the Navex Global case management system (EthicsPoint). This will provide visibility to the whistleblower of the actions taken by the company in respect of their concern.

Discouragement of whistleblowing

If any individual attempts to discourage other employees from coming forward with a concern this will be treated as a disciplinary offence. This will also apply to anyone who criticises, harasses, bullies, isolates or victimises them in any way as a result of having come forward with a concern(s).

General principles

- Be aware of the importance of eliminating fraud or wrongdoing at work. Report anything that you become aware of that is illegal
- You will not be victimised, subjected to a detriment or dismissed for raising a legitimate matter under this procedure
- Victimisation of an employee for raising a qualifying disclosure under this procedure will be a disciplinary offence and will be dealt with under the Company's disciplinary procedure
- Covering up someone else's wrongdoing is also a disciplinary offence. Never agree to remain silent about a wrongdoing, even if told to do so by a person in authority
- Finally, maliciously making a false allegation is a disciplinary offence

Associated Policies

This policy should be read in conjunction with all other Company policies such as Modern Slavery Policy and Anti-Corruption Compliance Policies.

Signed:

Managing Director