

THE ALUMASC GROUP PLC

“WHISTLEBLOWING” POLICY

The Group has in place what is called a “Whistleblowing” policy. It is a policy that gives all employees of the Company a way to voice concerns in a responsible and effective manner.

If you discover information which you believe shows serious malpractice or wrongdoing within the organisation then this policy provides you with a route to disclose the matter internally without fear of reprisal.

PLEASE NOTE: The “Whistleblowing” policy is intended to assist you if you have a concern about, or believe you have discovered, serious malpractice or impropriety. It is **NOT** designed to be used to question financial or business decisions taken by the Company or to cover private grievances or complaints about individual employment.

What is it designed to cover?

The Policy is designed to enable you to raise concerns internally and at a high level if you believe you have information regarding malpractice or impropriety in terms of:

- Financial malpractice or impropriety or fraud
- Failure to comply with a legal obligation or Statute
- Danger to Health & Safety or the environment
- Criminal activity
- Improper conduct or unethical behaviour
- Attempts to conceal any of these
- Conduct which appears likely to harm the reputation of the Company
- Attempts to give, receive or conceal a bribe

How am I protected?

Any disclosure you make must be made in good faith and in the reasonable belief that it tends to show malpractice. You must also make the disclosure to an appropriate person. In these circumstances your identity will remain confidential so long as it does not hinder or frustrate any investigation. You may make anonymous disclosures, however these are much less credible and may be considered only at the discretion of the Company.

If an individual makes malicious or vexatious allegations, and particularly if he or she persists with making them, disciplinary action will be taken against that individual.

How do I make a Disclosure under the “Whistleblowing” Policy?

1. Make a disclosure face to face or in writing to the Deputy Group Company Secretary.
2. Call the confidential hotline on 01536 383895. This line will only be answered by the Deputy Group Company Secretary. If he is not in then you can either leave a message on the confidential answerphone or ring back at a later date.

What happens next?

Disclosures of malpractice will be investigated in the first instance by the Deputy Group Company Secretary.

The Deputy Group Company Secretary will decide what action to take when a full investigation has been concluded and documented in writing.

This is a summary of the full Group policy which is available on request from the Group Offices.