

# AIR PARTNER

<b>POLICY:</b>	<b>GROUP WHISTLEBLOWING POLICY</b>
<b>EFFECTIVE DATE:</b>	<b>April 2019</b>
<b>POLICY OWNER:</b>	<b>GROUP HR DIRECTOR AND GENERAL COUNSEL</b>
<b>APPLIES TO:</b>	<b>ALL AIR PARTNER EMPLOYEES GLOBALLY INCLUDING TEMPORARY AGENCY STAFF, CONTRACTORS, CONSULTANTS AND WORK EXPERIENCE OR OTHER TRAINEES</b>

# **Group Whistleblowing Policy**

## **Introduction**

Air Partner (referred to as the Company in this policy) is committed to conducting its business with honesty and integrity.

The purpose of this policy is to encourage everyone who carries out work for the Company to raise any serious concerns they may have about the way in which the Company is run or about the conduct of those involved in running it or the conduct of any of the Company's stakeholders, including suppliers, customers and their employees. A culture of openness, honesty and accountability is essential in order to prevent violations from occurring and to address them when they occur.

The Company wishes to find out if malpractice or unlawful activity exists within the organisation or any of its stakeholders so that it can be dealt with appropriately. If left unchecked such activity has the potential to cause serious damage to the business and its reputation.

The Company will not tolerate any victimisation of any employees who raises a compliance concern in good faith.

This policy applies to everyone who carries out work for the Company including:

- All employees
- Contractors and sub-contractors
- Agency staff
- Consultants
- Work experience or other trainees.

This Policy may be amended by the Company at its discretion from time to time.

## **How to raise a concern**

A person who uses the Company's procedure for reporting violations to raise a concern will act in good faith and have good reason for believing that grounds for concern exist. Reports submitted in bad faith, maliciously, for personal gain or without good grounds may be subject to disciplinary actions.

The matters concerned include:

- The actual or possible commission of a criminal offence
- Corruption, bribery, kickbacks
- Conflict of interests
- Misappropriation or improper use of company assets or confidential information
- Physical or IT security violation
- Anti-competitive behaviour
- Breach of international trade compliance
- An actual or potential failure by the Company or an employee to comply with any legal obligation.
- An actual or possible miscarriage of justice.
- That the health or safety of any individual has been or may be put at risk.
- An actual or possible damage to the environment.
- Fraud, deception or any other serious matter observed in the workplace.
- Abuse, mistreatment, harassment or retaliation of employees
- Improper financial reporting or accounting practices
- Breach of professional standards and requirements

- Generally a breach of the Company's internal policies and procedures
- The deliberate concealing of information tending to show any of the above.

Methods of reporting may be as follows:

Option 1: report the concern to your manager or your manager's manager

Option 2: report the concern to the Human Resource Department or the General Counsel as appropriate based on the type of concern. You may also make reports orally or by mail, named or anonymous and sent to the Group HR Director or General Counsel. See Appendix 1 for Air Partner's address details.

Option 3: report the concern and engage in a confidential and protected communication cycle, using [speakout@airpartner.com](mailto:speakout@airpartner.com). Your concern will then be passed onto the Human Resource Department or the General Counsel as appropriate.

Option 4: report the concern to the Chairman of Air Partner Plc's Board, Mr Ed Warner. See Appendix 2 for his details.

Any person raising a concern who wants a meeting has the right to be accompanied by a work colleague.

### **Investigations**

Following the expression of concern, the Company will ensure that appropriate investigations are carried out including interviews with all the witnesses and other parties involved.

The person making the disclosure will be adequately informed of the investigation, and may be called upon to answer questions to assist with the enquiries. The need for confidentiality may prevent the Company giving specific details of the investigation or any disciplinary action taken as a result.

In some cases, the Company may need to appoint an investigator or team of investigators including staff with relevant experience or specialist knowledge of the subject-matter to undertake an investigation. The investigator(s) may also make recommendations for change to enable us to minimise the risk of future wrongdoing.

You should treat any information about the investigation as confidential.

If a concern is raised but after investigation, it turns out that there is a genuine and innocent explanation the matter will be treated as closed. The fact of having raised the concern will in no sense reflect badly on the person who raised it.

## **APPENDIX 1**

### **Contacts**

Group HR Director  
Craig Pattison  
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Group General Counsel  
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