



# WHISTLEBLOWING POLICY - RA INTERNATIONAL (RA)

## 1. Introduction

RA International (RA) is committed to the highest standards of openness, probity, accountability and, as an employee, you have an important part to play in ensuring we deliver on this commitment. An important aspect of accountability and transparency is a mechanism to enable employees to raise their concerns in a responsible and effective manner. It is a fundamental term of every contract of employment that an employee will faithfully serve his or her employer and not disclose confidential information about the employer's affairs. Nevertheless, where an individual discovers information which they believe shows serious malpractice, wrongdoing or illegal acts within the company, then this information should be disclosed internally without fear of reprisal or retaliation. Arrangements are in place to enable this to happen, independent of Line Management (although in relatively minor instances the Line Manager would be the appropriate person to be told).

RA have endorsed the provisions set out below to ensure that no employee should feel disadvantaged in raising legitimate concerns.

It should be emphasized that this policy is intended to assist individuals who believe they have discovered malpractice or impropriety. It is not designed to question financial or business decisions taken by the Company, nor should it be used to reconsider any matters which have already been addressed under current company policies and/or procedures.

## 2. Scope of Policy

This policy is designed to enable RA employees to raise concerns internally, and at a high level, to disclose information which the individual believes shows malpractice, impropriety or acts of illegality. This policy is intended to cover concerns which could include, but not limited to:

Financial malpractice or impropriety or fraud

Failure to comply with a legal obligation or Statutes

Dangers to Health & Safety or the environment

Criminal activity

Improper conduct or unethical behavior

Attempts to conceal any of these



### **3. Safeguards**

Protection - this policy is designed to offer protection to those employees of RA who disclose such concerns, provided the disclosure is made:

- in good faith
- in the reasonable belief of the individual making the disclosure, that it tends to show malpractice or impropriety and if they make the disclosure to an appropriate person. In extreme cases, malicious or willfully misleading reports could give rise to legal action on the part of the persons complained about.

### **4. Confidentiality**

RA will treat all such disclosures 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.

### **5. Anonymous Allegations**

This policy encourages individuals to put their name to any disclosures they make. Concerns expressed anonymously are much less credible, but they may be considered at the discretion of the Company. In exercising this discretion, the factors to be considered will include:

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

### **6. Untrue Allegations**

If you raise a concern, it will be taken seriously and investigated at the appropriate level. RA will endeavor to protect any individual who makes an allegation in good faith under this policy. If you make an allegation, but it is not confirmed via an investigation, then no action will be taken against you. However, if you make a malicious or vindictive allegation(s) which you know to be untrue, disciplinary action could be instigated you.

### **7. Procedures for Making a Disclosure**

Where an RA employee wishes to raise a complaint about an issue or item(s) or malpractice, then there are certain procedures which should be followed, as highlighted below:



Inform your Line Manager:

If you are concerned about any form of malpractice, you should normally raise the issue with your Line Manager. You should put any issues or complaint(s) that you have in writing to your Line Manager, or after initial verbal discussion – it should be followed by a report in writing and submitted to them. If you have a personal interest in the issue, then this must be declared within your written submission. If your concern falls more within the parameters of a grievance, then your Line Manager will inform you of this and direct you to the relevant RA policy for you to follow.

If you feel unable to tell your Line Manager:

If, for whatever reason, you feel uncomfortable or unable to inform your Line Manager about any concern(s) you may have, you should then raise this with the next management tier. Likewise, if you feel that this is not an option because, for example, you believe the next tier of management may be implicated in your concern or there's a direct conflict of interest, then you should raise the matter with the Compliance Manager or any member of the Senior Management Team in Dubai. They will be entrusted with the duty of investigating staff concerns about illegal, improper or unethical behavior.

Should none of the above routes be suitable or acceptable to the complainant, then they may utilize the alternative option of RA's whistleblowing web page (Ethicspoint) on the following URL: [raints.ethicspoint.com](https://raints.ethicspoint.com). This web page is hosted on Ethicspoint's secure servers and is completely independent of RA's website or intranet. A step-by-step guide on how to use this software platform, to report on any relevant issues, has been distributed to all employees.

If there is evidence of criminal activity, then the investigating officer should inform the relevant authorities. RA will ensure that any internal investigation does not hinder a formal investigation by any external authorities.

## **8. Timescales**

Due to the varied nature of these sorts of complaints, which may involve internal / external investigators and / or relevant external authorities, it is not possible to state 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 will, as soon as practically possible, send a written acknowledgement of the concern to the complainant. 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. Alternatively, if the report is made via Ethicspoint software platform, then the complainant can view the progress of any investigation within the 'follow-up on a report' option on the Ethicspoint home page (URL as stated previously).

All responses to the complainant should be in writing (except where Ethicspoint has been utilized) and sent to their home address marked "confidential".

## 9. Concerns with Investigation

If the complainant is not satisfied that their concern is being properly dealt with by the investigating officer, they have the right to raise it in confidence with the CEO in Dubai. The complainant will be required to put their concerns in writing, specifically stating what their concerns are, why they have these concerns and provide any additional information, with any available proof. The CEO will address the complaint in a reasonable timeframe - wholly dependent upon the volume of information and/or complexity of the complaint - and will advise the complainant of the outcome of such deliberations. The decision of the CEO, in this case, will be final and binding.

Policy Implementation/Review Date	Next Policy Review Date
31 <sup>st</sup> October 2020	1 <sup>st</sup> November 2022