


<b>Title:</b> WHISTLEBLOWING PROCEDURES & POLICY	<b>Document Number:</b> BWEK-HR-P-Whistleblowing.3	<b>No of Pages:</b> 3
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## 1. OBJECTIVES

BWEK is committed to its Vision, Mission, and Values as well as high standards of corporate governance. This includes, among other things, a commitment to provide a workplace free of dishonest, illegal, or discriminatory activities.

As part of our efforts in this area, the Company has the following existing procedures in place for seafarers and shore-based team members:

For seafarers, the Company's Fleet Regulations (which is a procedure manual of BWEK Management System) contain a section on conduct of ship staff and complaints procedures on-board. Seafarers should resolve matters according to the detailed complaints procedures set out in the Fleet Regulations. They can always contact any Managers in the Technical Department including the Head of Technical Department if the complaints are not resolved on board to their satisfaction.

For shore-based team members including management and Directors, the Company's Policies listed online via SharePoint include a Code of Conduct, Grievance Policy, and others (together with the "Staff Handbook"). The Staff Handbook sets out reporting channels and procedures for treatment of information. Team members are encouraged to communicate and resolve matters directly with their supervisors. This is the first step to the quick resolution of an issue. If the matter is not dealt with to the satisfaction of the team member, the second step is to discuss the matter with the Human Resources Department. At all times, team members are expected to act in good faith.

The Company recognises that there may be situations where team members consider it inappropriate or find it uncomfortable to report to their supervisors or the Human Resources Department or under the complaint's procedures previously mentioned. This Whistleblowing policy is to cover such situations.

Team members are encouraged to raise serious and genuine concerns, in confidence and in good faith, on a 24/7 basis about (a) misconduct; (b) unethical behaviour; (c) malpractices; (d) illegal acts including bribery, fraud or forgery; (e) harassment; (f) victimisation; (g) environmental pollution including pollution at sea; (h) serious violations of work safety standards including violations of such standards at sea, (i) violence or sexual assault against employees; (j) other failure to comply with regulatory requirements or (k) actual or potential suppression, destruction or manipulation of information regarding the above matters, without fear of reprisal.

## 2. WHISTLEBLOWING

Whistleblowing is a situation where an employee reports through an established and confidential channel, concerns about suspected misconduct, unethical behaviour, malpractices, illegal acts, harassment, victimisation, or other failure to comply with regulatory requirements. Team members can raise their concerns without fear of victimisation, discrimination, or disadvantage to the personnel listed in Section 3.

Only serious and genuine concerns should be reported under the Whistleblowing procedures and should be made in good faith and not for personal gain. Malicious and false allegations will be viewed seriously and treated as a gross misconduct and, if proven, may lead to disciplinary action including dismissal.

The Company will handle the report with care and will treat the whistle-blowers' concerns fairly and properly.

### 3. COMMUNICATION CHANNELS

- a) Any concern should be raised with your immediate supervisor or the Human Resources department or under the complaints procedures previously mentioned as stated in Section 1. If it is not possible or appropriate to do so, then your concerns should be directed to the Chief Executive Officer, whose contact details are as follows:

Name : Charles Maltby  
Email : [cmaltby@bwek.com](mailto:cmaltby@bwek.com)  
Mobile No : + 44 (0)7917 688993  
Address : 10 Pasir Panjang Road  
#17-01, Mapletree Business City  
Singapore 117438  
***(Please mark "Strictly Private and Confidential  
- To be opened by Addressee only")***  
Attention: Chief Executive Officer (BWEK)

- b) In cases where reporting to the management is considered inappropriate, the report should be addressed to a Chair of the Audit Committee, who is a non-executive director of the Company. Their contact details are as follows:

Name : Chair of the Audit Committee, Rita Granlund  
Email : [whistleblow@bwek.com](mailto:whistleblow@bwek.com)  
Address : 10 Pasir Panjang Road  
#17-01, Mapletree Business City  
Singapore 117438  
***(Please mark "Strictly Private and Confidential  
- To be opened by Addressee only")***  
Attention: Chairman of the Audit Committee (BWEK)

If you wish to make a report, please use the Internal Whistleblowing Form (BWEK-HR-F-Whistleblowing Form.0) provided separately. It may be submitted by electronic mail, telephone or by mail as set out above. If the report is to be sent by mail, please enclose the form in a sealed envelope clearly marked "Strictly Private and Confidential - To be opened by Addressee only."

### 4. ACTIONS

- a) All reports will be treated with great care and the strictest confidence.  
b) All reports, except for item (c) below, will be investigated promptly by the person receiving it. If required, the recipient can obtain assistance from other resources within the Group. The progress and results of the investigation will be reported to the Audit Committee as soon as possible.  
c) Anonymous reports will usually not be considered unless provided with specific and sufficient information.

- d) The format and the length of an investigation will vary depending upon the nature and circumstances of each report made. The matters raised may be:
  - i. Investigated internally.
  - ii. Referred to the relevant public or regulatory bodies.
  - iii. Referred to the company's External Auditor; and/or
  - iv. The subject of an independent inquiry.
- e) The recipient of the report will write to the whistle-blower as soon as practicable after receipt of the communication, acknowledging that the report has been received and stating whether an investigation is considered appropriate.
- f) Upon completion of investigation, an appropriate course of action will be recommended to the Audit Committee for its deliberation. Decisions taken by the Audit Committee will be implemented immediately.
- g) The recipient of the report will write to the whistle-blower detailing the action(s) taken.

## **5. PROTECTION**

Persons making genuine and appropriate reports under this policy are assured of fair treatment. In addition, team members are assured of protection against unfair dismissal, victimisation, or unwarranted disciplinary action, even if the concerns raised turned out to be unsubstantiated. BWEK reserves the right to take appropriate action against anyone who initiates or threatens to initiate retaliation against those who have raised concerns under this policy. Team members who initiate or threaten retaliation will be subject to disciplinary actions which may include dismissal. The management will support all team members and encourage them to raise concerns without fear of reprisal.

## **6. CONFIDENTIALITY**

All concerns and Whistle-blowers will be treated with great care and the strictest confidence, although in some cases the Company may be legally required to disclose the information.