



**ARAB SHIPBUILDING AND REPAIR YARD CO.**

**WHISTLEBLOWER  
POLICY**



## ARAB SHIPBUILDING & REPAIR YARD COMPANY WHISTLEBLOWER POLICY

### 1. POLICY STATEMENT

1.1 ASRY is committed to uphold high standards of business integrity, ethics and professionalism across all its activities with the adoption of Corporate Governance Policy, Code of Conduct ('Code'), Quality, Environmental, Health and Safety System procedures. These policies and procedures form the principles and standards that govern the actions of ASRY and its employees.

1.2 The objectives the of whistleblower policy are:

- a) To encourage ASRY employees, its contractors and stakeholders to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.
- b) To provide ASRY employees, its contractors and stakeholders with guidance as to how to raise those concerns.
- c) To reassure ASRY employees, its contractors and stakeholders that they should be able to raise genuine concerns in good faith without fear of reprisals, even if they turn out to be mistaken.

### 2. SCOPE OF THE POLICY?

2.1 This policy applies to :

- a) all individuals working at all levels of the Company, including senior managers, officers, employees, consultants, trainees (collectively referred to as **employees** in this policy);
- b) Contractors working for ASRY may also use the provisions of this Policy to make ASRY aware of any concerns that the contractor's staff may have with regard to any contractual or other arrangement with the ASRY. *The private concerns of the contractor's staff relating to non-ASRY business should be raised with the relevant contractor and/or other suitable agency/regulator – including the police, if appropriate.*
- c) Any other stakeholders of ASRY such as customers, bankers, consultants, vendors etc.



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### 3. DEFINITION OF WHISTLEBLOWING

3.1 Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers within ASRY work . This may include the following whistleblowing concerns :

- a) criminal activity;
- b) miscarriages of justice;
- c) danger to health and safety;
- d) damage to the environment;
- e) violation of any legal or professional obligation or regulatory requirements;
- f) bribery;
- g) financial fraud or mismanagement;
- h) negligence;
- i) breach of ASRY's internal policies and procedures including the ASRY's Code of Ethics;
- j) conduct likely to damage our reputation;
- k) the deliberate concealment of any of the above matters.

3.2 A **whistleblower** is a person who raises a genuine concern in good faith relating to any of the above. If the person has any genuine concerns related to suspected wrongdoing or danger affecting any of ASRY's activities (a **whistleblowing concern**) the person should report it under this policy.

3.3 This policy should not be used for complaints relating to own personal circumstances, such as the way a person has been treated at work. In those cases the person should use the grievance procedure in place within ASRY.

3.4 If a person is uncertain whether something is within the scope of this policy, the person should seek advice from the **whistleblower members** comprising the Managing Director and the Internal Audit Manager, the contact details of which are at the end of this policy.

### 4. REPORTING A WHISTLEBLOWING CONCERN

4.1 If persons have knowledge of any of the whistleblowing concerns, they should immediately inform **whistleblower members** comprising the Managing Director and the Internal Audit Manager. A meeting will be arranged with the whistleblowers as soon as possible to discuss their concern.

4.2 A written summary of the whistleblowers' concern will be recorded. The information recorded should be as precise as possible so as to allow for proper assessment of the nature, extent and urgency of preliminary investigative procedures to be undertaken.

4.3 It is aimed to provide the whistleblowers an indication of how ASRY will deal with the reported concern.



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### 5. CONFIDENTIALITY

- 5.1 It is hoped that all ASRY's employees, contractors and stakeholders will come forward to voice any of the whistleblowing concerns openly under this policy.
- 5.2 However, if the whistleblowers want to raise their concerns confidentially, **whistleblower members** will make every effort to keep their identities secret. If it is necessary for anyone investigating the case to know their identity, the **whistleblower members** will discuss this with them.
- 5.3 ASRY does not encourage whistleblowers to make disclosures anonymously. Proper investigation may be more difficult or impossible if further information cannot be obtained from the whistleblowers. Furthermore, it is also more challenging to establish whether any allegations are credible and have been made in good faith.
- 5.4 Whistleblowers who are concerned about possible reprisals if their identities are revealed should come forward to contact the **whistleblower members**, and appropriate steps shall be taken to preserve confidentiality.

### 6. EXTERNAL DISCLOSURES

- 6.1 This policy aims to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases it should not be necessary to alert anyone externally.
- 6.2 The law recognises that in some circumstances it may be appropriate for the whistleblowers to report their concerns to an external body such as a regulator. It will very rarely if ever be appropriate to alert the media. ASRY strongly encourage whistleblowers to seek **whistleblower members'** advice before reporting a concern to anyone external.
- 6.3 Whistleblowing concerns usually relate to the conduct of ASRY employees, but they may sometimes relate to the actions of a third party, such as a customer, supplier or service provider. It is encouraged to report such concerns internally first.

### 7. INVESTIGATION AND OUTCOME

- 7.1 Once whistleblowing concerns are raised, the **whistleblower members** will carry out an initial assessment to determine the scope of any investigation. They will inform the whistleblowers of the outcome of their assessment. The whistleblowers may be required to attend additional meetings in order to provide further information.
- 7.2 In some cases, an investigator or team of investigators maybe appointed, including employees with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable ASRY to minimise the risk of future wrongdoing.



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7.3 It is aimed to inform the whistleblowers the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent from providing specific details of the investigation or any disciplinary action taken as a result. Any information about the investigation is treated as confidential.

7.4 If it is concluded that a whistleblower has made false allegations maliciously, in bad faith or with a view to personal gain, the whistleblower will be subject to disciplinary action.

### 8. IF THE WHISTLEBLOWERS ARE NOT SATISFIED

8.1 If the whistleblowers are not satisfied with the way in which their concerns have been handled, they may contact the Board Audit Committee Chairman whose contact details are set out at the end of this policy.

### 9. PROTECTION AND SUPPORT FOR WHISTLEBLOWERS

9.1 It is understandable that whistleblowers are sometimes worried about possible repercussions. ASRY aims to encourage openness and will support those who raise genuine concerns in good faith under this policy, even if they turn out to be mistaken.

9.2 Whistleblowers must not suffer any detrimental treatment as a result of raising a concern in good faith. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

9.3 If the whistleblowers believe that they have suffered any such treatment, they should inform the **whistleblower members** immediately. If the matter is not remedied they should raise it formally using the grievance procedure.

9.4 Employees must not threaten or retaliate against whistleblowers in any way. Anyone involved in such conduct will be subject to disciplinary action.

### 10. RESPONSIBILITY FOR THE SUCCESS OF THIS POLICY

10.1 The Board has overall responsibility for this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.

10.2 The **whistleblower members** has day-to-day operational responsibility for this policy, and must ensure that all managers and other employees who may deal with concerns or investigations under this policy receive regular and appropriate training.

10.3 The **whistleblower members**, in conjunction with the Board, should review this policy from a legal and operational perspective at least once every 2 years.

10.4 All employees are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing.



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**11. CONTACTS**

<b>Whistleblower members</b>	<p>Managing Director Arab Shipbuilding and Repair Yard Co. P.O. Box 50110, Hidd, Kingdom of Bahrain</p> <p>Email: <a href="mailto:mazenm@asry.net">mazenm@asry.net</a></p> <p>Internal Audit Manager Arab Shipbuilding and Repair Yard Co. P.O. Box 50110 , Hidd Kingdom of Bahrain</p> <p>Email : <a href="mailto:thomasd@asry.net">thomasd@asry.net</a></p>
<b>Board Audit Committee Chairman</b>	<p>Board Audit Committee Chairman Arab Shipbuilding and Repair Yard Co. P.O. Box 50110, Hidd, Kingdom of Bahrain</p> <p>Email: <a href="mailto:auditcom.chairman@asry.net">auditcom.chairman@asry.net</a></p>



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**FLOW OF PROCESSES INVOLVED IN WHISTLEBLOWER POLICY**

