

# Adler Pelzer Group

## Whistleblowing Policy



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## What is Whistleblowing?

Whistleblowing is the term used when an employee passes on information concerning wrongdoing. To be covered by whistleblowing law, an employee who makes the disclosure must reasonably believe two things.

The first is that they are acting in the public interest. The second thing that an employee must reasonably believe is that the disclosure tends to show past, present or a likely wrongdoing falling into one (but not limited to) of the following categories:

- Criminal offences (this may include, for example, types of financial impropriety such as fraud)
- Failure to comply with an obligation set out in law
- Miscarriages of justice
- Endangering of someone's health & safety
- Damage to the environment
- Covering up wrongdoing in the above categories

## Policy

This policy sets out the investigation process and safeguarding of our employees.

To create a culture of integrity, the Adler Pelzer Group recognises the importance of empowering our people to make the right choices and having the ability to disclose any types of wrongdoing within the organisation.

All employees deserve to be treated with dignity and respect at all times. In circumstances where they are not being treated in this way, whistleblowing ensures that the malpractice is acted upon.

The Adler Pelzer Group will take all concerns raised seriously and will investigate thoroughly and in line with our values and principles.







## Our Values and Principles

### PASSION

*Our Entrepreneurial Spirit*

We take responsibility for what we do.  
We tackle each and every issue if our company was our own.  
We are passionate about what we do, simply because we enjoy it!  
We are a proactive part of our vision towards the future.

### PARADIGMA

*Innovative Thinking*

We aim towards being a leader in our field.  
We tend to create trends.  
We push for changing the Paradigm, Envisioning is our first step towards doing this.  
We see innovation as the door towards the future.

### PEOPLE

*Believe, it is possible*

We ask ourselves to believe in ourselves, since this is our way of achieving what other deem "impossible".  
We never give up, since others count on us and we strive to make it possible.  
We allow ourselves to make mistakes, since this is the only way to grow based on what we learn from these experiences.

### PACE

*Fast Execution*

We are fast in executing the decisions reached, since this is essential for our business results.  
We are energetic, This is part of our DNA, we "talk the walk".

### PROCESS

*Engineering driven*

We strive for technological excellence.  
We think process and are passionate towards our products.  
We deliver solutions.

### PROCESS

*Customer oriented*

We consider our customer to be part of us, since they are partners for our growth.  
We maximise our value chain, in order to streamline it with our products, for us, as well as for our customers.

### PERFORMANCE

*Meeting objectives, delivering the future*

We are trustworthy in meeting our objectives.  
We ask ourselves to constantly challenge our own performance.  
Envisioning & delivering is our virtuous circle.

### **We recognise our employees are valuable ears and eyes:**

We have identified that employees are often the first people to witness any type of wrongdoing which could damage our organisation's reputation and or performance.

### **Getting the right culture:**

We want to maintain an open and supportive culture where our workers feel comfortable to making a disclosure. This should be visible through all levels of leadership.

### **Being able to respond:**

We understand that it is in our best interest to deal with a disclosure when it is first raised by an employee. Where appropriate feedback will be given.

### **Better Control:**

We embrace the importance source of information the Whistleblowing Policy brings to the organisation.

### **Resolving the wrongdoing quickly:**

We recognise the benefits of a disclosure internally rather than outside the organisation, we promise to act promptly on the information and put right whatever wrongdoing is found.

## **Confidentiality**

There may be a good reason why an employee wishes their identity to remain confidential. The law does not compel an organisation to protect the confidentiality of a whistle blower, however, the Adler Pelzer Group will do everything possible to protect personal information and be sensitive how the disclosure is handled.

It can be more difficult for a disclosure to be quantified if the employee remains anonymously, this is because there would be in no documentary evidence linking the worker to the disclosure.

## **How to raise concerns**

Concerns can be raised via the [Adler Pelzer Group Corporate website](#).

Concerns will be transferred to an independent outlook account which can only be accessed by the Director of HR, Director of Compliance & Legal and the Director of Internal Audit & Risk Management.

## Whistleblowing Committee Members

The Whistleblowing Steering Committee members consists of the HR Director, Compliance and Legal Director and Risk Management & Internal Audit Director. They will monitor and track open concerns and agree the appropriate actions to take. Urgent meetings can be conducted at any time if a new concern raised is identified as either a high risk to the business or an immediate threat of Health & Safety to our employees.

The Whistleblowing Committee members will conduct themselves with:

- **Integrity** – Shall perform their work with honesty, diligence and responsibility.
- **Objectivity** – Shall make balanced assessments.
- **Confidentiality** – Shall respect the value and ownership of information and will not disclose information without appropriate authority unless there is a legal obligation to do so.

## Dealing with disclosures

Once a disclosure has been made a meeting will be held to gather all the information needed to understand the situation. In some cases a suitable conclusion may be reached through an initial conversation with a Manager. In more serious cases there may be a need for a formal investigation.

It is for the Committee members to decide what the most appropriate action to take is.

It is important to note that if an investigation concludes that the disclosure was untrue it does not automatically mean that it was raised maliciously by an employee.

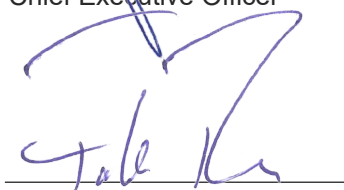
A central record of all disclosures will be held by the Compliance Director.



**Pietro Lardini**  
Chief Executive Officer

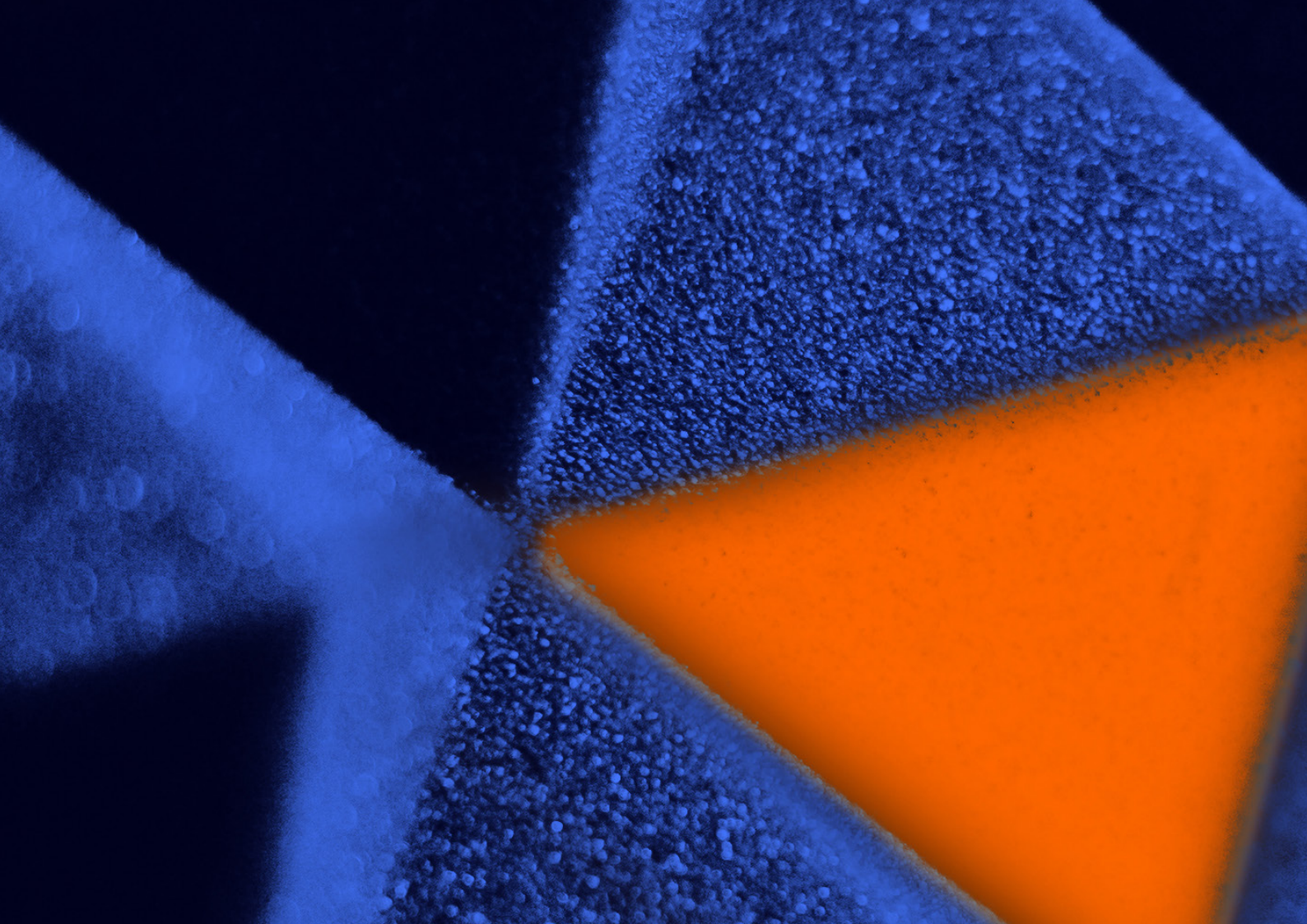


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