

## GUIDANCE REGARDING REPORTING AND WHISTLEBLOWING

This guidance is not principally intended for Crown Agents Group employees or consultants, who can access advice and guidance more relevant to their circumstances on the Group's intranet, gems.

This guidance is principally intended for employees or consultants of Crown Agents' business partners or any members of the general public who have an interest in or concern for Crown Agents.

### **Where and how can I raise an issue or concern?**

Crown Agents' Group Ethical and Compliance team, based in the UK, operates a dedicated email address, [compliance@crownagents.co.uk](mailto:compliance@crownagents.co.uk) or can be contacted by telephone (+44 (0) 20 8643 3311) to receive reports or to discuss situations where concerned parties have concerns or issues of the kind detailed below.

Crown Agents has established a global confidential whistleblowing hotline called 'The Ethical Line' or TEL for short.

These facilities are there for you to use:

- if you want to report a situation where you suspect that any bribery, corruption, fraud, theft, money laundering, coercion, anti-competitive or collusive behaviour, other unlawful or unethical behaviour in relation to Crown Agents' businesses or operations anywhere in the world or a breach of Crown Agents' policies or procedures or a material breach of any contract to which Crown Agents is a party ("misconduct") is occurring, has occurred or is planned to occur, or
- if you think an issue or concern along the lines of the above that you have already reported by some other means is not being handled properly.

Please note that TEL must not be used for HR grievances, customer complaints or complaints or grievances by consultants, contractors or other business partners that do not relate to suspected violations of the law, our codes or policies.

Telephone calls to TEL are free and its lines are open 24 hours a day and 7 days a week. The relevant numbers are listed below, as is the web access and confidential e-mail address for those who prefer to use these methods.

TEL is operated by Expolink, an independent external company which specialises in operating confidential global telephone, web and e-mail reporting systems, and which has been engaged to provide this service for Crown Agents.

**Q: How can I contact TEL?**

A: TEL can be accessed in any of three ways:

a) by telephone, using the contact numbers listed below

b) via the web, by following this link:

<http://www.expolink.co.uk/whistleblowing/for-employees>

and you will then be asked for the 'company access code': "crownagentsTEL"

c) by e-mail, by sending an e-mail (anonymised if you wish) to:

[ca-tel@expolink.co.uk](mailto:ca-tel@expolink.co.uk)

**Q: What happens when I call TEL?**

A: A member of Expolink's trained personnel ("the operator") will take a written note of your call and then make a confidential report to Crown Agents Global HQ in Sutton, UK. Expolink will not tape record or trace your call. You can phone, send a web report or e-mail them in total confidence.

**Q: Will I be required to give my name?**

A: We would prefer that you did give your name as this will help us to better assess your issue or concern and it may enable us to deal with your issue or concern more quickly. Giving us your name will enable us to contact you to get a better understanding of your issue or concern and to provide you with feedback. However, save for citizens of Spain and Portugal where whistleblowers are legally required to give their names, you have the right to make an anonymous report to TEL. Even if you do wish to make an anonymous report, we would ask that you agree with the TEL operator a method for us (through the operator) to contact you again. If you wish, to enable us to contact you about your report, you can give your name and contact details to Expolink and instruct them not to pass these on to Crown Agents. We and Expolink will respect your stipulation.

**Q: Can I speak to TEL in a language other than English?**

A: Whilst the initial TEL operator will answer in English, Expolink can make qualified interpreters available but this may necessitate a brief delay while this is organised or they may need to call you back.

**Q: Who in Crown Agents will get to know about my call, web report or e-mail ('report')?**

A: The details of your report will only be known to the Chief Compliance Officer, Chief Executive and Chairman and such other persons who are specifically involved in any investigation of your issue or concerns and the relevant Crown Agents' main board committee(s) to which the

investigators are required to report. Should your issue or concern directly concern the Group Chief Compliance Officer and/or their designated deputy, Chief Executive or Chairman they will be excluded from knowledge of your details and report.

**Q: Will I get any feedback on what is happening about the issue or concern I have reported to TEL?**

A: Yes, whether you give your name and contact details or, if you wish to remain anonymous, you should agree with the TEL operator a feedback method for us to get back to you, such as you ringing back the TEL operator within an agreed timeframe.

The TEL operator will give you a case number so that you can call them to find out what is happening. We will do our best to notify you through TEL when we believe the issue or concern you reported has been resolved. Please note that in some circumstances, for example where criminal investigations or privacy rules apply, we may not be able to provide you with full details.

**Q: What if I'm not absolutely sure that there is something not right going on?**

A: If you honestly and in good faith have a concern relating to misconduct (as defined above) then it is important that you report it without delay to your Line Manager, Departmental or Divisional Head, Group Legal Services, Group Compliance, an Executive Director or via TEL. If you make such a report in good faith and it turns out that your belief or suspicions were mistaken you will not be penalised in any way.

**Q: How can I be certain that I will not be penalised or victimised?**

A: Crown Agents is committed to actively encouraging good faith reports of concerns and issues of this nature and to protecting the makers of such reports from penalty and victimisation. Accordingly, we are fully committed to protecting you from penalty and victimisation and to maintaining the independence and confidentiality of the TEL facility.

Anyone who attempts to undermine our commitments in this regard will be liable to disciplinary action, including dismissal for gross misconduct. In addition, in certain jurisdictions you may also be protected under protection of disclosure laws.

**Q: What if someone makes a malicious or frivolous report?**

A: Any employee of Crown Agents found to have made a malicious or frivolous report to TEL, or to have deliberately given false or misleading information, will be liable to disciplinary action, including dismissal for gross misconduct. Any consultant, contractor or other party with whom Crown Agents has a contract or an employee or director of such entities who makes malicious or frivolous reports to TEL, or who deliberately gives false or misleading information to TEL, is liable to having their or its contract(s) with Crown Agents terminated for cause.

Importantly, Crown Agents' TEL facility is only intended to be used for good faith reports of issues or concerns regarding breaches of the law and/or of Crown Agents' Anti-Corruption Policy for Associated Persons, Ethical Code for Business Partners or other internal policies and procedures. (Calls made for other purposes are liable to be treated as frivolous.)

**Q: I am not an employee of Crown Agents but want to raise an issue or concern regarding a possible breach of the law or other misconduct; can I do so by using TEL?**

A: TEL is open to anyone who cares about Crown Agents. Crown Agents positively encourages anyone, whether an employee or not, who has an honest and good faith concern or issue regarding a possible breach of the law involving Crown Agents or any of its agents or business partners or our codes to report to these to Crown Agents as soon as ever possible either directly (to the Chief Compliance Officer – [compliance@crownagents.co.uk](mailto:compliance@crownagents.co.uk) or T +44 (0) 20 8643 3311) or using TEL, if you prefer. When using TEL please make sure you inform the operator that your call relates to a Crown Agents company.

Note: If your issue or concern does not relate to a possible breach of the law or other misconduct (as defined above) you should not use TEL but, instead, contact Crown Agents directly. Crown Agents' global office contact numbers can be found on Crown Agents' website ([www.crownagents.com](http://www.crownagents.com)) or your nominated Crown Agents contact if you are a consultant, contractor, supplier or other business partner of Crown Agents.

**The Ethical Line (TEL) contact numbers, web and e-mail addresses**

In each case you will be speaking to an operator of Expolink, Crown Agents' independent global whistleblowing hot-line contractor.

International Freephone Numbers

Country	Freephone active	Freephone number
Argentina	Yes	0800 6662603
Australia	Yes	1800 121 889
Austria	Yes	0800 281700
Bahrain	Yes	80004475
Bangladesh	Yes	Bangladesh dials 157001 then the caller will either get through to the operator or hear a recorded message which will then prompt them to

Country	Freephone active	Freephone number
		dial 8779167615.
Belgium	Yes	0800 71025
Brazil	Yes	0800 891 8807
Bulgaria	Yes	00800 110 44 74
Canada	Yes	1888 268 5816
Chile	Yes	123 002 004 12
China Netcom (North)	Yes	00800 3838 3000
China Telecom (South)	Yes	10800 441 0078
Croatia	Yes	0 800 222 845
Columbia	Yes	01800-944 4796
Costa Rica	Yes	08000440101
Cuba		For Cuba dials 2935 then he will either get through to the operator or hear a recorded message which will then prompt them to dial 8779167615
Cyprus	Yes	800 95207
Czech Republic	Yes	800 142 428
Denmark	Yes	8088 4368
Egypt	Yes	0800 000 00 23
Eire	Yes	1800 567 014
Estonia	Yes	800 00 44 265
Finland	Yes	0800 116773
France	Yes	0800 900240
Germany	Yes	0800 182 3246
Greece	Yes	00800 441 31422

<b>Country</b>	<b>Freephone active</b>	<b>Freephone number</b>
Hawaii	Yes	1866 293 2604
Hong Kong	Yes	800 930770
Hungary	Yes	06800 14863
Iceland	Yes	800 82 79
India	Yes	000 800 440 1286
Indonesia	Yes	001 803 0441 1201
Israel	Yes	1809446487
Italy	Yes	800 783776
Japan	Yes	00531 78 0023
Korea (South)	Yes	00308 442 0074
Latvia	Yes	8000 26 70
Lithuania	Yes	8800 30 444
Luxembourg	Yes	8002 4450
Malaysia	Yes	1800 807055
Malta	Yes	800 62404
Mexico	Yes	01800 123 0193
Netherlands	Yes	0800 022 9026
New Zealand	Yes	0800 443 816
Norway	Yes	800 14870
Pakistan	Yes	00800 900 44181
Philippines	Yes	1800 1442 0076
Poland	Yes	00800 441 2392
Portugal	Yes	800 880 374
Puerto Rico	Yes	1866 293 1804

<b>Country</b>	<b>Freephone active</b>	<b>Freephone number</b>
Romania	Yes	08008 94440
Russia	Yes	810 800 2058 2044
Saudi Arabia	Yes	800 844 0172
Singapore	Yes	800 4411 140
Slovakia	Yes	0800 004461
Slovenia	Yes	0800 80886
South Africa	Yes	0800 990520
Spain	Yes	900 944401
Sri Lanka	Yes	011 244 5413 (dialling from Colombo omit 011)
Sweden	Yes	0200 285415
Switzerland	Yes	0800 563823
Taiwan	Yes	0080 10 44202
Thailand	Yes	001 800 442 078
Turkey	Yes	00800 4463 2066
United Kingdom	Yes	0800 374199
UAE (United Arab Emirates)	Yes	8000 44 138 73
USA	Yes	1877 533 5310
Venezuela	Yes	0800 100 3199
Vietnam	Yes	120 11527

Where there is no Freephone number please communicate the following:

Collect call/reverse charge number steps as follows:

- 1 Caller dials their country operator
- 2 Asks for an international collect call or reverse charge to:

0044 1249 661 808

- 3 Operator will dial the number and speak to an Expolink Operator who will accept the call and charges
- 4 Country operator connects caller to Expolink, leaves the call and then the call takes place as normal

### **Web Access**

You can access TEL via the web by following this link:

<http://www.expolink.co.uk/whistleblowing/for-employees>

and you will then be asked for the 'company access code' "crownagentsTEL"

### **E-mail**

You can e-mail TEL by sending an e-mail to:

[ca-tel@expolink.co.uk](mailto:ca-tel@expolink.co.uk)

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