

APPENDIX I - WHISTLEBLOWING POLICY

This is a copy of our Whistleblowing policy which applies to everyone who carries out work for Diaploous.

Introduction

We are committed to conducting our business with honesty and integrity and we expect all staff to maintain high standards in accordance with our policies and procedures. However, all organisations face the risk of things going wrong from time to time, or of unknowingly illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring or to address them when they do occur.

The aims of this policy are:

To encourage staff 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.

To provide staff with guidance as to how to raise those concerns.

To reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

Who does this policy apply to?

This policy applies to everyone who carries out work for the Company, including:

- Partners
- All employees
- Contractors and sub-contractors
- Agents
- PCASP
- General Public

What is whistleblowing?

Whistleblowing is the disclosure of information which relates to suspected wrongdoing (generally a breach of a legal, statutory or regulatory requirement or unethical, immoral behavior, bribery, corruption). This may include:

- Breach of a legal requirement - e.g. health and safety obligations owed by the Company and/or an individual
- General malpractice - such as immoral, illegal or unethical conduct
- Gross misconduct
- Potential breach of Diaploous standards / policies / requirements etc.
- Breach of Diaploous Code of conduct
- Breach in Bribery and Corruption issues

If you have any genuine concerns related to any of the above, you should report it under this policy.

If you are uncertain whether something is within the scope of this policy you should seek advice from the Quality Manager and/ or Compliance Manager.

Protected disclosures

A "protected disclosure" is any disclosure of information which - in the reasonable belief of the individual making the disclosure - tends to show that one or more of the following has been committed, is being committed or is likely to be committed. The disclosure must be made in accordance with certain conditions - these conditions are less onerous if the disclosure is made internally:

- A criminal offence
- A failure to comply with any legal obligation
- A miscarriage of justice
- The putting of someone's health or safety in danger
- Damage to the environment
- Deliberate concealment of information relating to any of the above
- Bribery of officials, crew members, partners, customer, subcontractor e.t.c

Raising a whistleblowing concern

All whistleblowing disclosures will be treated as confidential and will be reported to the Compliance Manager.

We also have an independent resource, the Speak Up Box located in our premises, which allows you to raise a concern in confidence and anonymously if you so wish. You can also use the compliance@diaplous-ms.com.

You should make it clear that you are making your disclosure within the terms of the Company's whistleblowing policy. This will ensure the recipient of the disclosure realizes this and takes the necessary action to investigate the disclosure and to protect the whistleblower's identity. We will then get in touch with you to discuss your concern. We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result.

You should treat any information about the investigation as confidential. While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy you can help us to achieve this.

Confidentiality

We hope that staff will feel able to voice concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible. If you are concerned about possible reprisals if your identity is revealed, you should come forward to the Quality Manager and appropriate measures can be taken to preserve confidentiality. Anonymous concerns will nevertheless be taken seriously and investigated as fully as possible.

Protection and support for whistleblowers


It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support staff members that raise genuine concerns under this policy, even if they turn out to be mistaken.

Company is committed to ensuring that employees can speak up with confidence if they have any concerns or need to ask for help. If employees suspect or observe anything that they think might be in contravention of this policy, they have an obligation to report it. No person, employee or other, making a complaint should fear any form of retribution.

“Raise your concerns with the Compliance Manager in the first instance. Alternatively, report your concerns under the Whistleblowing Policy.”

Company will not tolerate retaliation in any form against anyone for raising concerns or reporting what they genuinely believe to be improper, unethical or inappropriate behaviour. All reports will be treated confidentially.

Any improper or illegal conduct, both internally or by third parties, must be documented and reported to competent authorities.

Date: April 2020	Position: Director	Name: K. Papaioannou	Signature: 
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