

Whistleblower policy

Experts in perimeter protection



Introduction

Heras supports the highest standards in corporate governance. Our goal is to promote excellent governance by assuring our employees of our commitment to quality, openness, responsibility and integrity.

As part of our commitment to living up to these high standards, this statement is designed to support and encourage employees or others with serious concerns or information about questionable practices to do the right thing and come forward to voice these concerns. We recognise that employees may need to come forward on a confidential basis. We want to make it clear that they can do so without fear of retaliation.

The purpose of this Whistleblowing Policy is to encourage employees to raise serious concerns by "whistleblowing" within the company, rather than ignoring an issue or raising it externally. The policy is not intended to be used for pursuing grievances about a personal situation, as the Company already has policies and procedures for this.

General principles

- Concerns should only be raised in good faith and should not be raised to further a personal grievance or private dispute;
- Victimising employees who make a report or preventing them from raising a genuine concern about fraud, corruption, malpractice or unethical behaviour will constitute a serious disciplinary offence;
- Abuse of this procedure by maliciously or mischievously making unfounded accusations, whether internal or external, will be considered a serious disciplinary offence;
- When an allegation is made, the person(s) against whom the allegation is made must be informed of the allegation and the evidence to support it, and must be given the opportunity to comment before the investigation is completed;
- Any allegation of wrongdoing shall be treated in the strictest confidence and investigated immediately. The identity of the person making the complaint will not be disclosed to the alleged perpetrator of wrongdoing without that person's prior consent, unless this is incompatible with a fair investigation. You will be informed of the need to disclose your identity in any case;

- Any disclosure under this policy must be made in good faith. If you make a complaint, you must reasonably believe the complaint to be true and it must not be made for personal gain.

Procedure

The Company understands that it is never easy for an employee to raise a concern, especially one involving corruption, dishonesty, health and safety or environmental issues. Employees are urged to raise their concerns as soon as possible to prevent a situation from becoming worse. All concerns should be raised with the immediate supervisor or the HR manager.

Alternatively, the procedure below may be followed.

This procedure applies to the following allegations:

- That a criminal offence has been committed, is being committed, or is likely to be committed;
- That a person has failed, is failing, or is likely to fail to comply with a legal obligation to which he is subject;
- That a miscarriage of justice has occurred, is occurring or is likely to occur
- that the health and safety of a person has been, is or is likely to be endangered
- that the environment has suffered, is suffering or is threatened with damage
- that information indicating that a matter falling within one of the above categories has been, is being or is likely to be deliberately withheld.

In the first instance, you must report any allegation falling under this procedure in writing to your line manager or HR manager. A record of the report will be made and we will either investigate the report or arrange for an appropriate member of the Steering Team to do so. Once the investigation is complete, we will inform you of the outcome of the investigation, without prejudice to the rights of third parties.

Anonymous reports cannot be dealt with. Naturally, the report will be treated confidentially and the employee will remain anonymous. The starting point is that malpractice must be reported to the manager. If the supervisor is involved, or if there is a fear of adverse effects on his/her position or the working atmosphere, the employee can approach his/her supervisor's manager or an HR employee. If the employee does not feel comfortable doing this, he or she can contact the hotline/confidential advisor: contact@bmwe.info.

The report - possibly in consultation with the confidential advisor - is submitted in writing by you and contains a clear description of the situation and is signed.

If the employee reports an abuse in good faith, he or she will enjoy legal protection. Heras will ensure that the employee's position at work will not be adversely affected in any way by the report.

Published by	Heras
Contact Person	Country HR Manager
Purpose	Ensure transparent and compliant business conduct
Application / Distributed to	All employees
Classification	Public
Monitoring	Executive committee
Version	V_1.1
Signed off by / on	Board Heras

