

## WHISTLE BLOWER POLICY & PROCEDURE (JAL/QMS/WB/POL&PRO)

Updated: June 2021

This policy covers Jebel Aviation Logistics Limited.

CD Signature:



A handwritten signature in black ink, consisting of a stylized 'J' followed by a vertical line and a small flourish at the bottom.

## INTRODUCTION

The Board of JAL is committed to maintaining the highest standards of honesty, openness, and financial accountability. Employees may be the first to know when someone is doing something illegal or improper in relation to the company. The Board of JAL takes all malpractice very seriously, whether it is committed by senior managers, staff, suppliers, or contractors. This document sets out a procedure by which you can report your concerns.

## WHAT SORT OF ACTIVITIES SHOULD I REPORT USING THIS PROCEDURE?

It is impossible to give an exhaustive list of the activities that constitute misconduct or malpractice but, broadly speaking, these will be criminal offences or failures to comply with legal obligations. If you make a report in good faith then, even if it is not confirmed by an investigation, your concern will be valued and appreciated, and you will not be liable to disciplinary action. However, if you make a false report, maliciously or for personal gain, then you may face disciplinary action.

EXAMPLES OF WHAT WARRANTS WHISTLEBLOWING AND WHAT DOES NOT	
	
Fraudulent activity	Someone is late for work
HSSE Violation	Someone has not come to work
Theft	Someone is sick and not reported in as such

## HOW DO I MAKE A REPORT?

You must make a report in writing specifying as much detail as you can. The Board would normally expect you to raise your concerns internally to either your line manager or their immediate superior. If, under the circumstances, you do not feel comfortable about making a report directly to management, then you can report instead to a director at JAL using [james.montanana@jebelaviation.com](mailto:james.montanana@jebelaviation.com). Please say if you want to raise the matter in confidence so that appropriate arrangements can be discussed and made, if possible. It will not always be possible to take forward anonymous reports.

## WILL JAL PROTECT MY IDENTITY IF I MAKE A REPORT?

JAL will do everything possible to keep your identity secret, if you so wish. However, there may be circumstances (for example, if your report becomes the subject of a criminal investigation) wherein you

may be needed as a witness. Should this be the case we will discuss the matter with you at the earliest opportunity.

### ***Acting in Good Faith***

This Whistle Blower Policy is intended to encourage and enable directors, officers, Employees and all of our other stakeholders to raise serious concerns within the Company rather than seeking resolution outside the Corporation. Anyone filing a report must be acting in good faith and have reasonable grounds for filing a report. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

### ***Handling of Reported Violations***

The Board of Directors shall address all reported concerns or complaints, including those regarding operations, compliance, accounting standards and non-financial code of ethics violations. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation. In some circumstances, the use of a reputable advisor may be utilised to assist the Directors in the review and decision-making process.

### ***Retention of Records***

The Company shall retain records relating to any concern or report of a retaliatory act and to the investigation of any such report for a period judged to be appropriate based upon the merits of the submission. The types of records to be retained shall include records of all steps taken in connection with the investigation and the results of any such investigation.

### ***Review of Policy***

The Board of Directors will review and evaluate this Policy on an annual basis to determine whether the Policy is effective in providing appropriate procedures to report violations or complaints regarding operations, compliance, accounting standards and non-financial code of ethics violations.

### ***Queries***

If you have any questions about how this Policy should be followed in a particular case, please contact the HR Department or Country Director.