



WHISTLEBLOWING POLICY &
PROCEDURE



WHISTLEBLOWING PROCEDURE

Management Team, Business Managers, Staff

Dear Colleagues,

It is important to WTS Energy's continued success that its policy and procedure concerning WHISTLEBLOWING is clearly communicated throughout the whole organization.

WTS Energy is committed to the highest standards of transparency, probity, integrity and accountability.

This procedure is intended to provide a means of making serious allegations about standards, conduct, financial irregularity or possible unlawful action in a way that will ensure confidentiality and protect those making such allegations in the reasonable belief that it is in the public interest to do so from being victimized, discriminated against or disadvantaged.

At every level and in every part of the organization, our values must guide and align our behavior as we make business decisions and operate on a day-to-day basis.

Thank you for your ongoing commitment to ensure that, together, we are all living the values that will help us achieve our vision. If you have any queries on how this procedure will operate, then please raise them initially with your line manager.



Den Haag, March '23
Jean Paul de Jong

PURPOSE OF THIS POLICY

The Whistleblowing Policy and Procedure sets out the framework for dealing with allegations of illegal and improper conduct.

The Policy applies to and protects employees, including Associates and contractors who speak up when they encounter behavior by or within WTS that is/seems unethical, illegal or goes against WTS values, so that WTS can address and correct inappropriate conduct and actions.

This procedure does not replace other WTS Energy policies or procedures. For example, if an employee has a concern about the conduct of a fellow employee in the working environment (e.g. that they are not treating colleagues with respect) they should raise these with their line manager, or if that is not possible, with the CEO, COO or any Board Member.

This procedure is intended to ensure that WTS Energy complies with the EU Directive on Whistleblowers Protection.

ORGANIZATIONAL STRUCTURE AND SUPPLY CHAINS

This policy covers all the activities of WTS Energy and its subsidiaries. It governs all our Business dealings and the conduct of all persons or organizations with whom we contract directly or who we appoint to act on our behalf.

We expect all, or who have, or seek a business relationship with WTS Energy and/or any member of our Company, to familiarize themselves with our Whistleblowing Policy and to act always in a way which is consistent with our Whistleblowing Policy.

WTS Energy is a Netherlands - Headquartered Manpower & Recruitment Company, providing Manpower services globally to mainly the Oil & Gas and Energy sector.

The Company currently has offices in 21 countries in the following continents: Asia, Africa, North America & Europe

RESPONSIBILITY FOR THE PROCEDURE

The CEO/COO and Members of the Board have overall responsibility for the operation of this Procedure and for determining the administrative processes to be followed and the format of the records to be kept.

In addition, the Operations department will liaise with other relevant departments such as the QA & HSE and the Legal team to ensure that risk analysis and investigations/due diligence in relation to whistleblowing activities are carried out as required.

Operations will ensure that all Employees are given adequate and regular training on the issue of whistleblowing activities so that everyone understands and complies with this policy.



REPORTING

WTS Energy recognizes that the decision to make an allegation can be a difficult one to make. However, whistleblowers who make serious allegations in the reasonable belief that it is in the public interest to do so have nothing to fear as they are fulfilling their duty either to WTS Energy and/or to those for whom WTS Energy provides a service.

WTS Energy will take appropriate action to protect a whistleblower who makes a serious allegation in the reasonable belief that it is in the public interest to do so from any reprisals, harassment or victimization.

CONFIDENTIALITY

All allegations will be treated in confidence and every effort will be made not to reveal a whistleblower's identity unless the whistleblower otherwise requests.

Similarly, if the allegation results in court proceedings, then the whistleblower may have to give evidence in open court if the case is to be successful.

WTS Energy will not, without the whistleblower's consent, disclose the identity of a whistleblower to anyone other than a person involved in the investigation/allegation.

ANONYMOUS ALLEGATIONS

This procedure encourages whistleblowers to put their name to an allegation wherever possible as anonymous allegations may often be difficult to substantiate/prove. Allegations made anonymously are much less powerful but anonymous allegations will be considered at the discretion of the CEO/COO/Board Members.

In exercising discretion to accept an anonymous allegation the factors to be considered:

- The seriousness of the issue raised
- The credibility of the allegation; and
- Whether the allegation can realistically be investigated from factors or sources other than the complainant

UNTRUE ALLEGATIONS

No disciplinary or other action will be taken against a whistleblower who makes an allegation in the reasonable belief that it is in the public interest to do so even if the allegation is not substantiated by an investigation.

However, disciplinary action may be taken against a whistleblower who makes an allegation without the reasonable belief that it is in the public interest to do so (e.g. making an allegation frivolously, maliciously or for personal gain where there is no element of public interest).

PROCEDURE FOR MAKING AN ALLEGATION

It is preferable for allegations to be made to an employee's line manager to whom they report. However, this may depend on the seriousness and sensitivity of the issues involved and who is suspected of malpractice. For example, if the whistleblower believes that management is involved it would be inappropriate to raise it directly with them. The whistleblower may then make an



allegation direct to any of the following:

- The CEO/COO
- Members of Board
- Anonymously

If either of the above receives an allegation he/she will consider the allegation and may discuss it with either the CEO/COO or other Board Members. The line manager (or either/or both) of the above, after consideration, will discuss with the whistleblower and if they wish to proceed with the allegation will be investigated.

ALLEGATION

Whether a written or oral report is made it is important that relevant information is provided including:

- The name of the person making the allegation and a contact point (if not anonymous);
- The background and history of the allegation (giving relevant dates and names and positions of those who may be able to have contributed to the allegation);
- The specific reason for the allegation. Although someone making an allegation will not be expected to prove the truth of any allegations, they will need to provide information to the person they have informed to, to establish that there are reasonable grounds for the allegation.

Someone making an allegation may be accompanied by another person of their choosing during any meetings or interviews in connection with the allegation.

However, if the matter is subsequently dealt with through another procedure the right to be accompanied will at that stage be in accordance with the relevant procedure.

Concerns may be submitted via the whistleblower form, delivered to the Operations Director for urgent discussion within the management team: <https://forms.office.com/e/SSWZJZD5fc>

ACTION ON RECEIPT OF AN ALLEGATION

The line manager will record details of the allegation gathering as much information as possible, (within 5 working days of receipt of the allegation) including:

- The record of the allegation;
- The acknowledgment of the allegation;
- Any documents supplied by the whistleblower

The investigator will ask the whistleblower for his/her preferred means of communication and contact details and use these for all communications with the whistleblower in order to preserve confidentiality.

If the allegation relates to fraud, potential fraud or other financial irregularity the Members of Board will be informed within 5 working days of receipt of the allegation. The Members of Board will determine whether the allegation should be investigated and the method of investigation.

If the allegation discloses evidence of a criminal offense it will immediately be reported to the Board

of Members and a decision will be made as to whether to inform the Police. If the allegation concerns suspected harm to children, the appropriate authorities will be informed immediately.

TIMETABLE

An acknowledge the allegation in writing within 10 working days with:

- An indication of how the WTS Energy propose to deal with the matter
- An estimate of how long it will take to provide a final response
- An indication of whether any initial inquiries have been made
- Information on whistleblower support mechanisms
- Indication whether further investigations will take place and if not, why not

Where the allegation has been made internally and anonymously, obviously the XXX will be unable to communicate what action has been taken.

SUPPORT

WTS Energy will take steps to minimize any difficulties which may be experienced as a result of making an allegation. For instance, if a whistleblower is required to give evidence in criminal or disciplinary proceedings WTS Energy will arrange for them to receive advice about the procedure and advise on the support mechanisms that are available.

WTS Energy accepts that whistleblowers need to be assured that the matter has been properly addressed. Thus, subject to legal constraints, we will inform those making allegations of the outcome of any investigation.

MONITORING

A Register will record the following details:

- The name and status (e.g. employee) of the whistleblower
- The date on which the allegation was received
- The nature of the allegation
- Details of the person who received the allegation
- Whether the allegation is to be investigated and, if yes, by whom
- The outcome of the investigation
- Any other relevant details

The Register will be confidential and only available for inspection by the Board of Members. The CEO/COO will report to the Board of Members on the operation of the Procedure and on the whistleblowing, allegations made during the period covered by the report. The report will be in a form which does not identify whistleblowers.

RELEVANT POLICIES & PRACTICES

WTS Energy operates the following policies & practices that describe its approach to the identification of whistleblowing risks and steps to be taken to protect whistleblower activity during its operations.

The Company's policy on whistleblowing encourages all its Employees, Customers and other Business Partners to report any concerns related to the direct activities of the organization or its supply chain.

The Company's whistleblowing procedure is designed to make it easy for Employees to make disclosures, without fear of retaliation. Employees who have concerns can refer to the Company's Whistleblowing Policy which is available on the Company website. The nature of the complaint will determine the Company's next course of action.

We endeavor to carry out our own recruitment activities and/or to only use reputable employment agencies to source labor and we carry out appropriate background checks. Personnel responsible for the recruitment activities in any of the subsidiaries are advised to adhere to this policy by ensuring that strict verification of potential Employee's right to work is carried out before any offer of employment is made.

WTS Energy expects its subsidiaries and all supply chain to adhere to recruitment practices that ensure that all terms of employment are voluntary. Where necessary and if required, we may request a demonstration of compliance with this policy.

AWARENESS & PERFORMANCE INDICATORS

Besides a training practice, the Company will raise awareness of whistleblowing issues by emailing the Company's Whistleblowing Policy to all Employees as well as it is made available on the Company's website.

Further to this, the Company plans to continue to create awareness on whistleblowing issues through training workshops and annual update communications.

To conclude, the Company understands whistleblowing issues are not static, therefore, we will continue to mitigate this risk and review our Key Performance Indicators to ensure effective systems and controls are in place to safeguard against any form of grievance or unfavorable treatment is taking place within our Business or supply chain.