



WHISTLE BLOWER POLICY

Introduction

The Board of Archer International Limited is committed to maintaining the highest standards of honesty, openness, financial accountability and adherence to human rights in all their forms. Employees may be the first to know when someone is doing something illegal or improper in relation to the company. The Board of Archer International Limited takes all malpractice very seriously, whether it is committed by senior managers, staff, suppliers or contractors. Furthermore Archer International acknowledges that third parties may be affected by its operations. This document sets out procedures 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. Abuses of human rights may include: illegal detention; excessive use of force; torture or other cruel, inhuman or degrading treatment or punishment; sexual exploitation and abuse or gender based violence; human trafficking; slavery and forced labour; the worst forms of child labour and discrimination. All complaints and concerns will be valued and appreciated. Complaints by employees will not lead to disciplinary action, or any other repercussions. All complaints will be investigated. Upon request, any complainant will receive complete anonymity and protection against retaliation.

How do I make a report?

You must make a report in writing specifying as much detail as you can. For employees, 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 using whistleblower@archerinternational.co.uk. Please say if you want to raise the matter in confidence so that appropriate arrangements can be discussed and made if possible. Third parties may report complaints directly using whistleblower@archerinternational.co.uk.

Will Archer protect my identity if I make a report?

Archer International will do everything possible to keep your identity secret, if you so wish, and endeavor to protect you from potential retaliation. However, there may be circumstances (for example, if your report becomes the subject of a criminal investigation) whereby you may be required as a witness. Should this be the case we will discuss the matter with you at the earliest opportunity.