



WHISTLE-BLOWING POLICY

CORPORATE GOVERNANCE

DRA Global

DRA-00-CG-POL-007

Revision: 2

APPROVALS

Description	Name	Title	Signature	Date
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REVISION RECORD

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REFERENCE DOCUMENTS

Document Number	Document Description
DRA-00-CG-POL-001	Anti-Bribery and Anti-Corruption Policy
DRA-00-CG-CODE-001	Code of Conduct
DRA-00-CG-STM-002	Values Statement

DEFINITIONS

Terms	Definition
BU	Business Unit of the Company
EAP	Employee Assistance Program
The Company	DRA Global Limited and all its subsidiaries and related entities also known as the 'Group'
Detrimental Conduct	<p>means any actual or threatened conduct that could cause detriment to the whistle-blower as a result of making a disclosure including:</p> <ul style="list-style-type: none"> • termination of employment; • harassment, bullying or intimidation; • personal or financial disadvantage; • unlawful discrimination or adverse employment consequences; • harm or injury, including psychological harm; • damage to reputation; or • any other conduct that constitutes retaliation.
Reportable Conduct	<p>means conduct, which is an offence or a breach of law;</p> <ul style="list-style-type: none"> • the unauthorised use of company resources; • dishonest behaviour, e.g. possible corruption, fraud, theft and price-fixing; • sexual or physical abuse; • any unethical conduct, e.g. discrimination of any sort or breach of the Code of Conduct; • serious failure to comply with appropriate professional standards; • abuse of power and conflicts of interest; • breach of company policies and/or procedures; • a serious risk to public health, public safety; • any health and safety risks; or • a serious risk to the environmental abuse; • any other conduct which may cause loss to the Company or be detrimental to the interests of the Company.

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1 THE PURPOSE OF THIS POLICY

As an organisation, the Company is committed to doing business with integrity, honesty and with transparency and to prevent any form of dishonest behaviour, irregularities and unethical, illegal or corrupt behaviour in our business affairs. In order to live up to this commitment, we encourage our employees and stakeholders to communicate any serious concerns that they may have about our business through the appropriate reporting channels provided by the company without fear of intimidation, disadvantage or reprisal.

2 SCOPE OF THIS POLICY

The type of concerns covered by this policy include items of Reportable Conduct or any other serious matter that may cause harm to the Company.

For clarity, the type of concerns to be raised do not include “personal work-related grievances”. These are generally grievances relating to an employee’s current or former employment or engagement (or that of their relative or dependent who is an employee) that have implications for that person personally, and that do not have broader implications for the Company.

As the Company is an entity incorporated in Australia, this policy reflects the requirements of the Australian whistle-blower legislation. Group entities outside of Australia are required to adopt the principles of the Australian legislation and to the extent that any local laws are in any way inconsistent with this policy or impose a higher level of protection than this policy, those local laws take precedence in that jurisdiction to the extent of the inconsistency.

The Annexures for each jurisdiction describe special protections for whistle-blowers who disclose information concerning misconduct or an improper state of affairs or circumstances in relation to the Company.

3 WHO DOES THIS POLICY APPLY TO?

This policy applies to anyone who is, or has been any of the following with respect to any entity of the company:

- Employees;
- Directors;
- Officers;
- Contractors (including employees of contractors);
- Suppliers (including employees of suppliers);
- Associates and consultants; and
- Relatives, dependants or spouses of any of the above individuals.

4 HOW TO SEEK GUIDANCE CONFIDENTIALLY

If you have a business concern, suspect wrongful behaviour in the Company, or if you are uncertain if a business decision or activity is legal or in line with the Company’s policies and procedures, contact your line manager for guidance. All Company managers are bound to uphold the highest ethical standards and the guidance given to you will be treated as confidential.

Confidentiality means that although your identity is known by the person you speak to, he/she will not make your name known unless there is an overriding legal obligation to do so or if you have given expressed permission to do so.

If you do not feel comfortable to approach your line manager for guidance or he/she was unable to help you, you should contact a senior manager or executive within your Business Unit (BU). To the extent you are either required or wish to escalate to someone else, or you need specific advice on an ethical dilemma or ethical concern that you may have, you may contact your BU Compliance Officer.

5 HOW TO REPORT WRONGDOING

5.1 Reporting Internally

Having a reliable reporting channel and ensured protection of whistle-blowers helps the Company to ensure that possible wrongdoing is reported, thoroughly investigated and remedial action implemented.

If you suspect or believe that Reportable Conduct has occurred, you should report the matter to your line manager as soon as possible. Your report will be treated as confidential.

If you do not feel comfortable informing your line manager or if you believe he/she may be involved, you should report the matter to a senior manager or executive within your BU. In cases of serious unethical behaviour, you should report the matter to your BU Compliance Officer. Your report will be treated as confidential.

To the extent that you do not feel comfortable reporting the matter to any Company staff member, you may seek to report the matter externally per clause 5.2 below.

5.2 External Reporting

The Company has employed the services of an independent external service provider to manage a whistle-blowing hotline on its behalf. You can use this hotline to report confidentially, and if you wish, anonymously.

You may make a report to our external independent whistle-blowing service using any of the methods detailed in the jurisdiction specific Annexure.

The external reporting service offers a 24-hour, seven-day-a-week, 365-day-a-year toll-free telephone and e-mail facility. The purpose is to protect whistle-blowers and to facilitate effective reporting in the Company.

You may also make a report to an external person or body, as relevant and to the extent provided for under relevant in-country legislation, and as detailed in the jurisdiction specific Annexure.

5.3 Anonymity and Confidentiality

When making a disclosure, you may do so anonymously. Whilst you are encouraged to share your identity when making a disclosure, as it will make it easier for the Company to address your disclosure, you are not required to do so. If you do not share your identity, the Company will assess your disclosure in the same way as if you had revealed your identity. However, there may be some practical limitations in conducting the investigation if you do not share your identity.

If an anonymous disclosure is made through any of the Company's external reporting services, you will receive a unique reference. You can then contact the relevant external reporting service to provide further information or request an update at any time.

If you make an anonymous disclosure, neither your phone number nor your e-mail address may be revealed by the external service provider. It is recommended that in order to protect your own anonymity, you should not seek to discuss the matter with anyone else in the Company.

Information contained in reports and provided by you in the course of an investigation will be kept confidential, except as required by law or where disclosure is necessary to regulatory authorities, law enforcement agencies or professional advisors to the Company.

Information about your identity and information that is likely to lead to your identification may only be disclosed in the following circumstances:

- Where the information is disclosed to a regulatory body such as ASIC, APRA or a law enforcement authority;
- Where the information is disclosed to a legal practitioner for the purpose of obtaining legal advice in relation to the operation of applicable whistleblowing protection laws; or
- Where you consent.

If the Company needs to investigate a report it may disclose information that could lead to your identification, but it will take reasonable steps to reduce this risk.

5.4 Details to Report

When contacting the Company's external reporting service, please give as many facts as possible. For example, state:

- Which business unit you work in/are involved with;
- When and where the incident(s) happened;
- The details of what happened;
- Who the parties (individuals or businesses) involved are;
- Whether you have any evidence, such as documentation, to substantiate what you say;
- If anything has been done;
- If you have reported it to your manager; and
- If you may be contacted for clarification of the facts (you will then have to give your name and contact details).

5.5 Reasonable Basis for Report

When making a disclosure, you will be expected to have reasonable grounds to suspect the information you are disclosing is true. You will not be penalised if the information turns out to be incorrect. However, you must not make a report you know is not true or is misleading. Where it is found that you knowingly made a false report, this may be a breach of the Code of Conduct and will be considered a serious matter that may result in disciplinary action up to and including, dismissal.

6 WHAT HAPPENS AFTER YOU REPORT?

Once a report has been recorded by an external service provider, a transcription will be given to the Company authorised representatives in different business units. The Company is not allowed to trace the report against your wishes.

All reports received either internally or externally through an external services provider are recorded and will be examined by the appropriate person, to determine whether there are reasonable grounds for suspicion that necessitate further action or investigation. If a report appears to have prima facie merit and there are enough facts recorded to substantiate the claim, an investigation will be launched by the Company.

The Company will ensure that all investigations:

- Are conducted by someone independent and impartial and never by the recipient of the report, or anyone implicated in its subject matter;
- Are conducted in the strictest confidence;
- Are conducted as quickly as possible given the circumstances involved;
- Are as thorough as possible;
- Are appropriately resourced;
- Protect your identity; and
- Provided that there are no restrictions or other reasonable bases for doing so, given anyone who is implicated in the subject matter of the report an opportunity to respond to any allegations made against them. Implicated individuals do not, however, have to respond.

The investigation may conclude with a report from the investigator. The report will include findings on the allegations and a summary of the evidence on which the findings are based. To the extent permitted under applicable laws, you and/or a person against whom allegations have been made will be informed

of the findings. Any report will remain the property of the Company and will not be shared with you or any person against whom allegations have been made.

In cases where a report is proven to be true, the appropriate disciplinary, civil and/or criminal action will be taken against all perpetrators. The causes of the Reportable Conduct will be evaluated and where needed, remedial action will be taken and new preventative measures will be implemented in the business.

7 INVESTIGATION FEEDBACK

Wherever possible, and assuming that your identity is known, you will be kept informed of the progress and outcomes of the investigation subject to privacy and confidentiality considerations. If an anonymous disclosure is made through any of the company's external reporting service, you will receive a unique reference. You can then contact the relevant external reporting service to provide further information or request an update at any time.

8 SUPPORT FOR WHISTLE-BLOWERS

Support available for whistle-blowers includes:

- For current employees and their immediate family members, access to an employee assistance program (EAP), to the extent available within your BU;
- Appointing an independent support person from the human resources team to deal with any ongoing concerns they you have.

9 CONNECTING YOU WITH THIRD PARTY SUPPORT PROVIDERS SITUATED IN EACH REGION SUPPORT FOR PERSONS IMPLICATED

No action will be taken against employees or officers who are implicated in a report under this Policy until an investigation has determined whether any allegations against them are substantiated. However, an employee or officer who is implicated may be temporarily stood down whilst an investigation is in process, or may be temporarily transferred to another office, department or workplace, if appropriate in the circumstances. Any such stand-down or temporary transfer may only continue for the duration of the investigation. If the investigation determines that the allegations are not substantiated, the employee officer must be immediately reinstated to full duties.

Any disclosures that implicate an employee or officer must be kept confidential, even if the whistle-blower has consented to the disclosure of their identity and should only be disclosed to those persons who have a need to know the information for the proper performance of their functions under this Policy, or for the proper investigation of the report. An employee or officer who is implicated in a disclosure has a right to be informed of the allegations against them and will be given an opportunity to respond to those allegations and provide additional information, if relevant, in the course of an investigation into those allegations (subject to the whistle-blower's right to anonymity).

Support available for persons implicated includes:

- For current employees and their immediate family members, access to an EAP, to the extent available within your BU;
- Appointing an independent support person from the human resources team to deal with any ongoing concerns they you have; or
- Connecting you with third party support providers situated in each region

10 DETRIMENTAL CONDUCT PROHIBITED

The Company strictly prohibits all forms of Detrimental Conduct against whistle-blowers. Detrimental Conduct means any actual or threatened conduct that could cause detriment to the whistle-blower as a result of making a disclosure including:

- Termination of employment;
- Harassment, bullying or intimidation;

- Personal or financial disadvantage;
- Unlawful discrimination or adverse employment consequences;
- Harm or injury, including psychological harm;
- Damage to reputation; or
- Any other conduct that constitutes retaliation.

Any Company employee, irrespective of seniority, who, directly or indirectly, retaliates against or victimises any whistle-blower who reported in good faith or who provided assistance to those responsible for investigating the allegations, will be subject to disciplinary action, which may include dismissal.

If you feel that have been, or may have been, victimised or subjected to Detrimental Conduct, as a result of having made a report of Reportable Conduct in the Company, you should contact your line manager, a senior manager or executive within your BU or to your BU Compliance Officer.

11 BREACH OF THIS POLICY

Any breach of this policy will be taken seriously and may result in counselling and / or disciplinary action, up to and including dismissal.

12 PUBLICATION OF THIS POLICY

The Company will publish this policy on the intranet for each entity, on its website and through education to employees.

ANNEXURE A: APAC**Making a Report**

You may make a report to our external independent whistle-blowing service using any of the following methods:

calling HALO on 1800 717 559 within Australia; or

Website www.DRAwhistleblowerservice.deloitte.com.au; or

Facsimile +61 3 9691 8182; or

Free postage DRA Whistleblower Service

Reply Paid 12628

A'Beckett Street

Melbourne VIC 8006; or

email DRAwhistleblowerservice@deloitte.com.au within Australia

You may also make a report to the following external people or bodies:

BDO Audit (WA) Pty Ltd, the auditor of the Company

- Level 1, 38 Station Street
- Subiaco WA 6008
- Australia
- Tel: +61 8 6382 4600
- Fax: +61 8 6382 4601
- www.bdo.com.au
- Attention: Neil Smith

ASIC

- Level 1
- 11 Mounts Bay Road
- Perth WA 6000
- Australia
- Tel: +61 1300 935 075
- Fax: +61 1300 729 000
- <https://asic.gov.au>

APRA

- Level 12
- 1 Martin Place
- Sydney NSW 2000
- Australia
- Tel: +61 2 9210 3000
- Fax: +61 2 9210 3411
- www.apra.gov.au

A lawyer (to obtain advice or representation about the *Corporations Act*)

Special protections under the *Corporations Act 2001* (Cth)

The *Corporations Act* gives special protection to disclosures about any misconduct or improper state of affairs relating to the Company if the following conditions are satisfied:

1. The whistle-blower is or has been:
 - a. an officer or employee of the Company;
 - b. an individual who supplies goods or services to the Company or an employee of a person who supplies goods or services to Company;
 - c. an individual who is an associate of the Company; or
 - d. a relative, dependent or dependent of the spouse of any individual referred to at (a) to (c) above;
2. The report is made to:
 - a. a line manager
 - b. a senior manager of a BU concerned;
 - c. a member of the Social and Ethics Committee;
 - d. The external auditor (or a member of that audit team);
 - e. ASIC;
 - f. APRA; or
 - g. a legal practitioner for the purpose of obtaining legal advice or legal representation in relation to the operation of the whistle-blower provisions in the *Corporations Act*;
3. The whistle-blower has reasonable grounds to suspect that the information being disclosed concerns misconduct, or an improper state of affairs or circumstances in relation to the Group. This may include a breach of legislation including the *Corporations Act*, an offence against the Commonwealth punishable by imprisonment for 12 months or more or conduct that represents a danger to the public or financial system.

Examples of conduct which may amount to a breach of the *Corporations Act* include: insider trading, insolvent trading, breach of the continuous disclosure rules, failure to keep accurate financial records, falsification of accounts, failure of a director or other officer of the Group to act with the care and diligence that a reasonable person would exercise, or to act in good faith in the best interests of the corporation or failure of a director to give notice of any material personal interest in a matter relating to the affairs of the company.

The protections given by the *Corporations Act* when these conditions are met are:

- a. the whistle-blower is immune from any civil, criminal or administrative legal action (including disciplinary action) for making the disclosure;
- b. no contractual or other remedies may be enforced, and no contractual or other right may be exercised, against the whistle-blower for making the report;
- c. in some circumstances, the reported information is not admissible against the whistle-blower in criminal proceedings or in proceedings for the imposition of a penalty;
- d. anyone who causes or threatens to cause detriment to a whistle-blower or another person in the belief or suspicion that a report has been made, or may have been made, proposes to or could be made, may be guilty of an offence and may be liable for damages;
- e. a whistle-blower's identity cannot be disclosed to a Court or tribunal except where considered necessary; and
- f. the person receiving the report commits an offence if they disclose the substance of the report or the whistle-blower's identity, without the whistle-blower's consent, to anyone except ASIC, APRA, the AFP or a lawyer for the purpose of obtaining legal advice or representation in relation to the report.

Confidentiality

1. If a report is made, the identity of the discloser must be kept confidential unless one of the following exceptions applies:
 - a. the discloser consents to the disclosure of their identity;
 - b. disclosure of details that might reveal the discloser's identity is reasonably necessary for the effective investigation of the matter;
 - c. the concern is reported to ASIC, APRA, or the AFP; or
 - d. the concern is raised with a lawyer for the purpose of obtaining legal advice or representation.

Special protections under the *Taxation Administration Act 1953*

The *Taxation Administration Act* gives special protection to disclosures about a breach of any Australian tax law by the Company or misconduct in relation to the Company's tax affairs if the following conditions are satisfied:

1. The whistle-blower is or has been:
 - a. an officer or employee of the Company;
 - b. an individual who supplies goods or services to the Company or an employee of a person who supplies goods or services to the Company;
 - c. an individual who is an associate of the Company;
 - d. a spouse, child, dependent or dependent of the spouse of any individual referred to at (a) to (c) above;
2. The report is made to:
 - a. a line manager
 - b. a senior manager of a Group company;
 - c. a member of the Social and Ethics Committee;
 - d. The external auditor (or a member of that audit team);
 - e. ASIC;
 - f. APRA; or
 - g. a legal practitioner for the purpose of obtaining legal advice or legal representation in relation to the operation of the whistle-blower provisions in the Corporations Act;
3. If the report is made to a Company recipient, the whistle-blower:
 - a. has reasonable grounds to suspect that the information indicates misconduct, or an improper state of affairs or circumstances, in relation to the tax affairs of the Company or an associate of the Company; and
 - b. considers that the information may assist the recipient to perform functions or duties in relation to the tax affairs of the Company or an associate of the Company; and
4. If the report is made to the Commissioner of Taxation, the whistle-blower considers that the information may assist the Company recipient to perform functions or duties in relation to the tax affairs of the Company or an associate of the Company.

The protections given by the *Taxation Administration Act* when these conditions are met are:

- a. the whistle-blower is immune from any civil, criminal or administrative legal action (including disciplinary action) for making the disclosure;
- b. no contractual or other remedies may be enforced, and no contractual or other right may be exercised, against the whistle-blower for making the report;
- c. where the disclosure was made to the Commissioner of Taxation, the reported information is not admissible against the whistle-blower in criminal proceedings or in proceedings for the imposition of a penalty, except where the proceedings are concerned with whether the information is false;

- d. unless the whistle-blower has acted unreasonably, a whistle-blower cannot be ordered to pay costs in any legal proceedings in relation to a report;
- e. anyone who causes or threatens to cause detriment to a whistle-blower or another person in the belief or suspicion that a report has been made, or may have been made, proposes to or could be made, may be guilty of an offence and liable to pay damages;
- f. a whistle-blower's identity cannot be disclosed to a Court or tribunal except where considered necessary
- g. the person receiving the report commits an offence if they disclose the substance of the report or the whistle-blower's identity, without the whistle-blower's consent, to anyone except the Commissioner of Taxation, the AFP or a lawyer for the purpose of obtaining legal advice or representation in relation to the report.

Confidentiality

- 1. If a report is made, the identity of the discloser will be kept confidential unless one of the following exceptions applies:
 - a. the discloser consents to the disclosure of their identity;
 - b. disclosure of details that might reveal their identity is reasonably necessary for the effective investigation of the allegations;
 - c. the concern is reported to the Commissioner of Taxation or the AFP; or
 - d. the concern is raised with a lawyer for the purpose obtaining legal advice or representation.

ANNEXURE B: EMEA**Making a Report**

You may make a report to our external independent whistle-blowing service using any of the following methods:

calling Tip-Offs on 0800 38 44 27 (International: +2731 571 5301); or
email dra@tip-offs.com

You may also make a report to the following external people or bodies:

Legal Advisor (to obtain advice or representation about the Protected Disclosures Act 26 of 2000, as amended)

Member of Cabinet/ Executive Council of Province, where relevant; where the employer is a Public Sector body

The Public Protector

The South African Human Rights Commission

The Commission for Gender Equality

The Commission for the Promotion and Protection of the Rights of Cultural, Religious and Linguistic Communities

The Public Service Commission

Auditor-General

Any Person, prescribed in certain circumstances

Protected Disclosures Act 26 of 2000 (as amended)

1. The *Protected Disclosures Act* indicates the purpose of the legislation is:
 - a. To protect employees and workers who blow the whistle;
 - b. To provide for remedies for whistle blowers against certain occupational detriment;
 - c. To provide procedures for whistle blowers to disclose information of improprieties in a responsible manner;
 - d. To create a culture facilitating the disclosure of information by employees and workers relating to criminal and other irregular conduct in the workplace in a responsible manner; and
 - e. To promote the eradication of criminal and other irregular conduct in the public and private sectors.

Special protections under the Protected Disclosures Act

The Act includes provisions for employees to report unlawful or irregular conduct by employers and fellow employees, while providing for the protection of employees who blow the whistle.

The *Protected Disclosures Act* gives special protection to disclosures about any misconduct, irregularity or improper state of affairs relating to the Company if the following conditions are satisfied:

2. The whistle-blower is or has been:
 - a. an officer or employee of the Company;
 - b. an individual who supplies goods or services to the Company or an employee of a person who supplies goods or services to the Company (defined as a “worker” under the Act);
 - c. an individual who is an associate of the Company; or
 - d. a relative, dependent or dependent of the spouse of any individual referred to at (a) to (c) above;
3. The report is made to:
 - a. a line manager.
 - b. a senior manager or executive of the Company of the BU concerned.
 - c. a member of the Social and Ethics Committee.

- d. a Compliance Officer of the BU concerned.
 - e. Any of the external people or bodies listed in this Annexure.
4. The whistle-blower has reasonable grounds to suspect that the information being disclosed concerns misconduct, or an improper state of affairs or circumstances in relation to the Company.
5. The irregularities covered by the *Protected Disclosures Act*, as amended, relate to the following:
- a. Criminal offences;
 - b. Failure to comply with certain legal obligations;
 - c. Miscarriages of justice;
 - d. Endangering of the health or safety of individuals;
 - e. Damage to the environment; and
 - f. Unfair discrimination as defined in the *Employment Equity Act* and the *Promotion of Equality and Prevention of Unfair Discrimination Act*.
6. The protections given by the Protected Disclosures Act when these conditions are met are:
- a. Being subjected to any disciplinary action;
 - b. Being dismissed, suspended, demoted, harassed or intimidated;
 - c. Being transferred against his or her will;
 - d. Being refused transfer or promotion;
 - e. Being subjected to a term or condition of employment or retirement which is altered, or kept altered, to his or her disadvantage;
 - f. Being refused a reference, or being provided with an adverse reference, from his or her employer;
 - g. Being denied appointment to any employment, profession or office;
 - h. Being subjected to a civil claim arising from their breach of any confidentiality requirement through the disclosure of a criminal act or of a planned or current failure to comply with a law;
 - i. Being threatened with any of the actions mentioned above; or
 - j. Being otherwise adversely affected in respect of his or her employment, profession or office, including employment opportunities and work security.

Confidentiality

1. If a report is made, the identity of the discloser will be kept confidential unless one of the following exceptions applies:
- a. the discloser consents to the disclosure of their identity;
 - b. disclosure of details that might reveal their identity is reasonably necessary for the effective investigation of the allegations; and
 - c. the concern is raised with a legal advisor for the purposes of obtaining legal advice or representation.

ANNEXURE C: AMERICAS**Making a Report**

You may make a report to our internal anonymous reporting line by:

calling 724-754-9799

Or you may make a report to our external independent whistle-blowing service using:

Email dra@tip-offs.com

Reporting

The Company has an open-door policy and suggests that employees may report any suspected violations of laws, rules, regulations, Company policies, including acts of discrimination, harassment, bullying, or any other workplace matter by contacting their supervisor. If the employee is not comfortable speaking with their supervisor or are not satisfied with the supervisor's response, they are encouraged to contact the Human Resource, Safety, or Legal Departments or make a report by calling the anonymous reporting line at 724-754-9799 and leaving a message, or by e-mail to dra@tip-offs.com.

Employees may also utilize the reporting mechanisms set forth in the local, state, provincial, and federal rules, regulations, or laws they believe may have been violated.

Reports are Confidential

Any reports may be made to the Company in person, by telephone or in writing, and will be kept in the strictest confidence compatible with a thorough investigation.

Investigation

Once a report is made, the Company will conduct a timely, thorough, and impartial investigation.

No Retaliation

Employees who in good faith report violations of any laws, rules, regulations or Company policies, directly to the Company or otherwise, will be protected from retaliation, i.e., such report will have no negative impact upon the employee's employment status. Any employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.