



Whistleblowing Policy

Introduction

The purpose of this policy is to ensure that any fraud, misconduct or wrongdoing by employees and third parties are reported and properly dealt with. ACS therefore encourages all individuals to raise any concerns that they may have about the conduct of others in the business or the way in which the business is run.

You must raise promptly any situations in which the Code of Conduct, its underlying policies or the law appear to be breached with a supervisor or manager. Alternatively, concerns can be raised with the appropriate manager in human resources, legal, or senior management.

Where a concern remains unresolved through local channels, it can be referred to the Whistleblowing Hotline.

Definitions

1. **Bribery** means giving, offering, promising or receiving anything of value with the intention of improperly influencing the behaviour or decision-making of any person in order to obtain, or retain, an advantage, or the rewarding of any person for such behaviour.
2. **Corruption** means, the dishonest or fraudulent misuse of power or the improper performance of a function which is of a public nature.
3. **Employees** shall mean, all individuals working at all levels and grades within ACS, including, directors, consultants, trainees, apprentices, seconded staff, casual workers, agency staff, interns, agents and sponsors;
4. **Third Parties** shall mean, any individual or organisation you come into contact with during the course of your work for ACS, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties;
5. **Misconduct** shall include, but not be limited to, the following behaviour:



- a. The commission of a criminal offence;
- b. Failure to comply with a legal obligation;
- c. A miscarriage of justice;
- d. Failure to comply with the ACS Code of Conduct or any ACS policy document;
- e. Serious violation of work discipline;
- f. The endangerment of health and safety;
- g. Damage to the environment; and
- h. Any deliberate concealment of the conduct identified above.
- i. Breach of the Criminal Finances Act 2017

Background

At ACS, we are committed to carrying out our business activities in an ethical and lawful way. All misconduct is contrary to the interests of our business and has a knock-on effect on our working environment and, conceivably, our livelihoods. In particular, we take a zero-tolerance approach to bribery and corruption and we are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate.

Any local laws, customs or practices which condone, permit or overlook bribery or corruption are to be disregarded for the purpose of compliance with this policy. The purpose of this policy ("The Policy") is to ensure that ACS employees and Third Parties know that ACS actively wishes them to report any misconduct and that they feel empowered to do so, including the ability to do so confidentially and/or anonymously.

We hope that you will feel able to raise your concerns with your line manager or another member of your management team. However, we understand that, in certain circumstances (for example, if your concerns relate to your line manager or another manager in the business) individuals may not feel comfortable in doing so. If you raise an issue you must do so in good faith. Abuse of this channel is not acceptable.

In order to provide an effective channel for reports of misconduct in such circumstances ACS has a dedicated confidential Whistleblowing Hotline which is operated 24/7 by Expolink, the details of which are set out below.

ACS encourages its employees and Third Parties to use this confidential Whistleblowing Hotline, by contacting Expolink free, 24/7 on 0800 374199 or [here](#) if you are outside the U.K. , rather than to raise their concerns in public. Public disclosure (for example, via a report in a newspaper) of misconduct affects the reputation of companies and their employees.

ACS' Promise

ACS promises that any reports made pursuant to the Policy will:

- a. Be treated with respect;
- b. Be treated in the utmost confidence;



- c. Remain anonymous wherever the person reporting the misconduct requests anonymity; and
- d. Be dealt with discreetly, appropriately and proportionately.

Dealing with reports appropriately and proportionately, will include:

- a. An investigation of all allegations of misconduct, irrespective of their source, provided that they contain sufficient, verifiable, facts and/or corroborating information; and
- b. Taking no steps to investigate where the report of misconduct consists of vague, unspecified, broad allegations without evidentiary or corroborating information.

We promise that, insofar as you indicate that you wish us to do so, we will inform you as to:

- a. Whether any further information is required from you; and
- b. What action will be taken in relation to your report, and why.

Most importantly, ACS promises that you will not be subjected to any adverse consequences if you report genuinely-held concerns about misconduct in good faith. If, however, any individual who has made a report in accordance with this Policy feels that they have been treated unfairly in any way, including any breach of confidence, they should report their concerns to the ACS Compliance Officer directly or, alternatively (for example, where they feel they have been treated unfairly by the ACS Compliance Officer), directly to the Ethics and Compliance Committee.

ACS promises that such concerns will be treated with the utmost seriousness and, if any such unfair treatment is proved, any person responsible for that such treatment will be sanctioned.

Responsibility for Policy

The Ethics & Compliance Committee (an ACS Board Sub-Committee) has overall responsibility for ensuring that this policy is effectively implemented throughout ACS. The Ethics & Compliance Committee headed up by the Company Secretary will report to the Board of Directors promptly on any matter involving criminal conduct, potential criminal conduct or a violation of this policy.

The policy will be formally reviewed by the Ethics & Compliance Committee on an annual basis, and monitored regularly by the ACS Compliance Officer (in particular, in response to any material changes to relevant law and procedural guidance), in order to ensure that it is appropriate, adequate and effective. Any necessary improvements identified will be implemented expeditiously. Employees and any Associated Persons of ACS who are required to comply with the terms of the policy will be advised of any key changes which are made.

Any conflicts between this policy and applicable local laws must immediately be reported, in writing, to the ACS Compliance Officer.



Questions and Concerns

Employees of ACS are strongly encouraged to raise questions or concerns at the earliest possible opportunity as to:

- a. The scope and application of this policy;
- b. Whether any particular act constitutes misconduct; and/or
- c. Any instance or suspicion of malpractice, or any action which could otherwise be viewed as a breach of this policy.

Any such questions or concerns will be treated in the strictest confidence and should be referred to the ACS Compliance Officer.

As indicated above, ACS actively encourages its employees to raise concerns without fear of reprisal or detrimental treatment and undertakes to offer its support to any such persons. Under no circumstances should any employee ignore or "turn a blind eye" when the circumstances indicate Misconduct or a possible breach of this policy.

Useful contact information:

Ethical Trading Manager
Email: corporatecompliance@uk.allportcargoservices.com
Tel: +44 (0)1895 206060