	Puregas Policy	Approval		
		Managing Director		
	Whistle Blowing for Suppliers	Doc. No: 28		
		Issue Date: 09/12/2015	Rev: 0	Rev Date: Dec 2018

Purpose

Puregas is committed to a culture of compliance, ethical behaviour and good corporate governance.

A Whistle blower program has been established to provide suppliers with a mechanism to raise issues or concerns, confidentially or anonymously, that they believe do not fit with Puregas ethical or legal standards.

Puregas strongly encourages suppliers and other interested parties to report any improper conduct, whether actual or suspected to Puregas Whistle blower Representative and will not tolerate any reprisals made against those making such reports. The identity and the details of the reported conduct will be kept confidential and secure.

Reportable Conduct

All suppliers are encouraged to report any genuine matters or conduct that they have reason to believe contravenes' Puregas' code of conduct, policies or the law, including:


- Conduct or practices which are illegal or breach any law, regulation or code of conduct.
- Fraudulent or corrupt conduct (dishonesty, fraud, misuse of information or material acquired).
- Coercion, harassment or discrimination by, or affecting, any team member or supplier.
- Misleading or deceptive conduct of any kind, including conduct or representations which amount to improper or misleading accounting or financial reporting practices.
- Serious harm to public health, safety and environment or the health and safety of any team member.
- Any action taken against, or harm suffered by a team as a result of making a report under this policy.

Please note that Puregas has no power to provide immunity from criminal prosecutions or other legal proceedings.

Identification of those reporting improper conduct

A disclosure under this policy can be made anonymously (by telephone only for suppliers). Anonymous disclosures may however limit the scope of the action that can be taken, including an investigation. For this reason, Puregas encourages parties wherever possible to identify them when making disclosures.

All disclosures will be treated with the utmost discretion and confidentiality. In certain circumstances it may be necessary to identify the person who made the disclosure. However,

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the person will be informed of this possibility before Puregas takes any action in relation to their report. Circumstances where the disclosure of the identity of a person reporting improper conduct could be required include:

- Defending the company, or for the purpose of providing Puregas with legal advice with respect to any legal proceedings initiated or threatened, against it
- Any associated criminal or other legal proceedings
- Circumstances where the Company is otherwise legally obliged to disclose the information or where Puregas determines that the information must be disclosed.

Unauthorised disclosure of information (including the identity of a person reporting improper conduct) other than in accordance with this policy may be the subject of disciplinary proceedings, including termination of contract.

Policy Review

This policy will be reviewed at least every 3 years to ensure effectiveness.