



TATA CHEMICALS EUROPE

WHISTLEBLOWING POLICY

October 2017

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1. POLICY STATEMENT

1.1 We are committed to conducting our business with honesty and integrity, and we expect all employees to maintain high standards in accordance with the Tata Code of Conduct, the Ethical Business and Anti-Corruption Policy and our other policies and procedures. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring or to address them when they do occur.

1.2 The aims of this policy are:

- (a) To encourage employees to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.
- (b) To provide employees with guidance as to how to raise those concerns.
- (c) To reassure employees that they should be able to raise genuine concerns in good faith without fear of reprisals, even if they turn out to be mistaken.

1.3 This policy does not form part of any employee's contract of employment and it may be amended at any time.

2. WHO IS COVERED BY THIS POLICY?

This policy applies to all individuals working at all levels of the organisation, including senior managers, officers, directors, employees, consultants, contractors, trainees, homeworkers, part-time and fixed-term workers, casual and agency staff (collectively referred to as **employees** in this policy).

3. WHAT IS WHISTLEBLOWING?

3.1 **Whistleblowing** is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:

- (a) criminal activity;
- (b) miscarriages of justice;
- (c) danger to health and safety;
- (d) damage to the environment;
- (e) failure to comply with any legal or professional obligation or regulatory requirements;
- (f) bribery;
- (g) modern slavery;

- (h) financial fraud or mismanagement;
- (i) breach of our internal policies and procedures including the Tata Code of Conduct;
- (j) conduct likely to damage our reputation;
- (k) unauthorised disclosure of confidential information;
- (l) the deliberate concealment of any of the above matters.

3.2 A **whistleblower** is a person who raises a genuine concern in good faith relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a **whistleblowing concern**) you should report it under this policy.

3.3 This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases you should use the Grievance Procedure.

3.4 If you are uncertain whether something is within the scope of this policy you should seek advice from the Compliance Officer, whose contact details are at the end of this policy.

4. RAISING A WHISTLEBLOWING CONCERN

4.1 We hope that in many cases you will be able to raise any concerns with your line manager. You may tell them in person or put the matter in writing if you prefer. They may be able to agree a way of resolving your concern quickly and effectively. In some cases they may refer the matter to the Compliance Officer.

4.2 Where you do not feel able to raise any concerns with your line manager, you are also able to raise the matter with any of our TCE Ethics Counsellors, whose contact details are at the end of this policy. The TCE Ethics Counsellor will be duty bound to raise your case with the Compliance Officer but may do so anonymously on your behalf.

4.3 However, where the matter is more serious, or you feel that your line manager or TCE Ethics Counsellor has not addressed your concern, or you prefer not to raise it with them for any reason, you should contact one of the following:

- (a) The confidential external “SpeakUp” hotline provided by an independent body InTouch
- (b) The Compliance Officer
- (c) The Managing Director
- (d) The Chairman of the Tata Chemicals Europe Holdings Limited Audit Committee.

Contact details for each of these are set out at the end of this policy.

4.4 We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a work colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

4.5 We will take down a written summary of your concern and provide you with a copy after the meeting. We will also aim to give you an indication of how we propose to deal with the matter.

5. CONFIDENTIALITY

5.1 We hope that employees will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

5.2 We do not encourage employees to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible and have been made in good faith. Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to the Compliance Officer or one of the other contact points listed in paragraph 4 and appropriate measures can then be taken to preserve confidentiality.

6. EXTERNAL DISCLOSURES

6.1 The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.

6.2 The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. It will very rarely if ever be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Public Concern at Work, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. Their contact details are at the end of this policy.

6.3 Whistleblowing concerns usually relate to the conduct of our employees, but they may sometimes relate to the actions of a third party, such as a customer, supplier or competitor. The law allows you to raise a concern in good faith with a third party, where you reasonably believe it relates mainly to their actions or something that is legally their responsibility. However, we encourage you to report such concerns internally first. You should contact one of the other individuals set out in paragraph 4 for guidance.

7. INVESTIGATION AND OUTCOME

- 7.1 Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment. You may be required to attend additional meetings in order to provide further information.
- 7.2 In some cases we may appoint an investigator or team of investigators including employees with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.
- 7.3 We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.
- 7.4 If we conclude that a whistleblower has made false allegations maliciously, in bad faith or with a view to personal gain, the whistleblower will be subject to disciplinary action.

8. IF YOU ARE NOT SATISFIED

- 8.1 While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy you can help us to achieve this.
- 8.2 If you are not happy with the way in which your concern has been handled, you can raise it with one of the other key contacts in paragraph 4. Alternatively you may contact the chairman of the Tata Chemicals Europe Holdings Limited Audit Committee or our external auditors. Contact details are set out at the end of this policy.

9. PROTECTION AND SUPPORT FOR WHISTLEBLOWERS

- 9.1 It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support employees who raise genuine concerns in good faith under this policy, even if they turn out to be mistaken.
- 9.2 Employees must not suffer any detrimental treatment as a result of raising a concern in good faith. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Compliance Officer immediately. If the matter is not remedied you should raise it formally using our Grievance Procedure.
- 9.3 Employees must not threaten or retaliate against whistleblowers in any way. Anyone involved in such conduct will be subject to disciplinary action.

9.4 A confidential support and counselling hotline is available to whistleblowers who raise concerns under this policy. Their contact details are set out at the end of this policy.

10. RESPONSIBILITY FOR THE SUCCESS OF THIS POLICY

10.1 The Board has overall responsibility for this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.

10.2 The Compliance Officer has day-to-day operational responsibility for this policy, and must ensure that all managers and other employees who may deal with concerns or investigations under this policy receive regular and appropriate training.

10.3 The Compliance Officer should review this policy from a legal and operational perspective at least once every three years.

10.4 All employees are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing. Employees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Compliance Officer.

11. CONTACTS

TCE Ethics Counsellors	<p>Karen Lounds Tel: 01606 724777 Email: klounds@tatachemicals.com</p> <p>Steve McGuinness Tel: 01606 724706 Email: smcguinness@tatachemicals.com</p> <p>Tony Naylor Tel: 01606 724186 Email: tnaylor@tatachemicals.com</p> <p>Fraser Ramsay Tel: 01606 724555 Email: framsay@tatachemicals.com</p> <p>Mark Roberts Tel: 01606 724774 Email: mroberts@tatachemicals.com</p> <p>Vicky Watson Tel: 01606 724522 Email: vwatson@tatachemicals.com</p> <p>John Whalley Tel: 01606 724673</p>
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Compliance Officer	Phil Davies Tel: 01606 724738 Email: pdavies@tatachemicals.com
InTouch “SpeakUp” Service	Helpline: 0808 100 5689 Website: www.intouchfeedback.com/tatachemicals using access Code: 82436
Managing Director	Martin Ashcroft Tel: 01606 724000 Email: mashcroft@tatachemicals.com
Chairman, Tata Chemicals Europe Holdings Limited Audit Committee	John Mulhall Tel: +91 22 6665 7387 Email: jmulhall@tatachemicals.com