



WHISTLE BLOWING PROCESS

ENQUIRIES: EXECUTIVE: RISK AND COMPLIANCE
APPLICABLE TO: ALL ATNS EMPLOYEES
REFERENCES: RC DIR 7/2010

HC DIR 26/2010
PUBLIC DISCLOSURE ACT 26 OF 2002

APPENDIX B

1. INTRODUCTION

This process is intended to help employees who have major concerns over any suspected wrong-doing within Air Traffic and Navigation Services ("the company") which could relate to unlawful conduct or financial malpractice. This process document must be read with the Fraud Directive (RC Dir7/2010), ATNS Disciplinary Code and Grievance Procedure (HC Dir26/2010) and Human Capital procedures.

2. OBJECTIVES

The objectives of this process document are to:

- 2.1. encourage employees to feel confident in raising serious concerns and to question and act upon their concerns;
- 2.2. provide ways for employees to raise those concerns and get feedback on any action taken as a result; and
- 2.3. re-assure employees that if they raise any concerns in good faith and reasonably believe them to be true, they will be protected from possible reprisals or victimisation.

It is not intended to be used where other more appropriate procedures are available, for example: grievances - (see ATNS Disciplinary Code and Grievance Procedure, RC Dir 7/2010) etc.

3. HOW SHOULD AN EMPLOYEE RAISE A CONCERN?

It is the responsibility of every official/employee to report all suspected incidents of corruption, fraud or theft or similar crime relating to actual or potential losses to the designated official/through the designated channel. As soon as an employee becomes reasonably concerned, he/she should raise the issue by calling the Fraud Hotline (0800 220 917) published through the company's communication means. Callers may choose to be anonymous, however, employees are encouraged to provide their name and contact details, especially if further investigation is required.

4. HOW WILL THE COMPANY RESPOND?

- 4.1. The company will assess initially what action should be taken. This may involve an internal inquiry or a more formal investigation.
- 4.2. Some concerns may be resolved by agreed action without the need for investigation.
- 4.3. A preliminary investigation will be conducted on all matters raised before action could be taken.
- 4.4. However, where there are reasonable grounds to believe that witnesses are intimidated by the presence of an individual on which the matter is being raised ("affected person"), an immediate action will be taken. Among others, an immediate action could include asking the individual to be absent from duty while the preliminary investigation carries on.