

WHISTLEBLOWING POLICY

1. INTRODUCTION

AMEA POWER is committed to conducting business responsibly, with honesty and integrity and to a high standard. However, all businesses and organisations face the risk of something going wrong or people behaving in ways which are not appropriate or acceptable.

AMEA Power wants to help resolve matters as quickly as possible and put things right where there are complaints about AMEA Power's standards and quality of service in its business relations.

Further, AMEA Power values and encourages any person to speak up and report where there are concerns about actual or suspected wrongdoing or misconduct in AMEA Power activities. This includes any actual or suspected breaches of the AMEA Power's Code of Conduct including associated policies, procedures and standards and any applicable laws. Remaining silent about possible breaches or misconduct may worsen a situation and speaking up will enable concerns to be investigated and dealt with appropriately. This is integral to maintaining the trust of AMEA Power staff, projects and owners, as well as maintaining its reputation.

This document sets out AMEA Power's Whistleblowing Policy ("Policy") on reporting complaints or raising concerns about actual or suspected wrongdoing or misconduct as well as the standards that will be applied and our commitments to complainants and persons raising concerns. It also sets out AMEA Power's zero-tolerance approach to victimisation and retaliation and commitment to take reasonable steps to protect those who make a complaint or who speak up in good faith.

2. SCOPE

2.1 Who's covered by the Policy?

This Policy applies to all activities undertaken by or on behalf of AMEA Power, and extends to:

- AMEA Power and all AMEA Power's Project Companies;
- third party service providers responsible for delivering the core activities of a AMEA Power ("Service Providers"); and
- persons and entities which receive funding from AMEA Power ("AMEA Power Recipients").

Where AMEA Power's ability to control or direct Service Providers or Recipients to comply with this Policy is constrained by external factors all reasonable endeavours will be made to require compliance with this Policy.

2.2 Who can place reliance on this Policy?

Any person or entity affected by AMEA Power, any project in which a AMEA Power is the investor/lender/guarantor, including anyone acting for or on their behalf may make a complaint or raise a concern.

2.3 What issues can be raised?

This Policy covers:

- a) Complaints relating to a multitude of issues, e.g. poor service, low standards or quality, attitude of a staff member or community disturbance, e.g. noise. The term “complainant” is used to describe someone making the complaint in such circumstances; the complainant will usually have a vested interest in proving his or her case and in the outcome.
- b) Concerns about risk, malpractice or wrongdoing in relation to AMEA Power activities which adversely affects the public interest, AMEA Power people (as defined below) or AMEA Power itself. This includes actual or suspected misconduct, any actual or suspected breaches of the AMEA Power Code of Conduct, AMEA Power Operating Policies and Procedures (including health, safety, environment and social (“HSES”) policies, standards and procedures) or any actual or suspected breaches of applicable laws and regulations.

Unless it is in the public interest, this Policy does not cover personal complaints or disputes about their own position, circumstances or treatment raised by any AMEA Power employee, executive and non-executive directors, committee members, agency workers, volunteers, interns, consultants and contractors (“AMEA Power People”). In such a case they should follow the internal grievance policy and procedures as set out in the relevant staff handbook, their engagement letter or contract.

3. OUR COMMITMENTS

3.1 Complaints and Whistleblowing procedures

AMEA Power commits to establish clear procedures for complaints and whistleblowing to ensure that:

- reporting a complaint or raising a concern is as easy as possible for both AMEA Power People and third parties;
- the complaint or concern is dealt with promptly, politely and, when appropriate, confidentially;
- the complaint or concern is handled fairly, consistently, and appropriately; and
- lessons are learned from complaints and concerns raised and used to make improvements.

3.2 Independent channels for raising concerns

AMEA Power commits to provide access to independent channels to any person who wishes to raise a concern. This service will be independent of AMEA Power, enabling concerns to be reported in complete confidence, including anonymously if required.

AMEA Power will seek to ensure the service is provided by skilled professional staff with ability to communicate in local languages.

3.3 Protection for individuals raising concerns

AMEA Power commits to protect all individuals who raise a concern in good faith. In particular, individuals will not suffer detrimental treatment by AMEA Power as a result of raising a genuine concern.

AMEA Power will not tolerate any harassment, victimisation or detrimental treatment of an individual (including informal pressures) and will take appropriate action to protect individuals who raise a concern in good faith in accordance with AMEA Power policies and procedures and any applicable law.

Any threats or retaliation by AMEA Power People will be treated as a serious disciplinary offence which will be dealt with under relevant disciplinary rules and procedures. Appropriate action will be taken in respect of any threats or retaliation by other persons connected with AMEA Power, which may include termination of contract.

AMEA Power will also seek to protect third parties connected with the person raising a concern who could suffer retaliation, such as facilitators, colleagues, relatives, and legal entities that the reporting person owns, works for or is otherwise connected with.

Individuals may have additional protections provided by law, depending on where they are located. AMEA Power is committed to complying with the laws in place in all relevant jurisdictions to protect persons raising and requires an equivalent commitment from Service Providers and Recipients.

3.4 Confidentiality

AMEA Power commits to treat all complaints and concerns in confidence and will protect all personal data in accordance with the applicable data protection laws. Every effort will be made not to reveal the identity of the complainant or person raising a concern to the extent permitted by law. If it is necessary for anyone investigating the complaint or concern to know the individual's identity, this will be discussed with the individual beforehand to the extent permitted by law or regulation.

Any person associated with AMEA Power will not take any steps to ascertain the identity of a person raising a concern anonymously under this Policy. Such action will be treated as a serious disciplinary offence.

3.5 No waiver of rights and remedies

AMEA Power will not, and will seek to ensure that Service Providers, Recipients and anyone acting on behalf of AMEA Power do not, waive or limit any legal rights or remedies available to any person in relation to the submission of a complaint or concern under this Policy or under any applicable legislation, whether by agreement, policy, term and condition of employment or other mechanism.

3.6 Communication and Training

AMEA Power commits to ensure this Policy and all related procedures will be made available to all AMEA Power Project Companies, Service Providers and Recipients using appropriate communication channels; that all AMEA Power People will receive appropriate training to ensure that they are fully aware of their rights and responsibilities under this Policy; and all AMEA Power managers will be fully briefed as to their role in supporting this Policy and the appropriate action to take in the event of any complaint being made or any concern being raised to them.

3.7 Record keeping

AMEA Power commits to keep adequate and relevant records which may include, but will not be limited to, investigation notes, meeting minutes and emails. The records will be kept in an organised and secure manner in accordance with applicable data protection legislation. Details of the report, the identity of the individual raising

the concern, and anyone mentioned in the report will be kept confidential throughout and after the investigation and only shared on a need-to-know basis or as required by law or regulation.

4 ROLES AND RESPONSIBILITIES

The Board of AMEA Power is responsible for approving this Policy following recommendation of AMEA Power's Audit Committee and is accountable for the management of complaints and whistleblowing reports received by AMEA Power.

AMEA Power's Audit Committee is responsible for reviewing this Policy and for reviewing AMEA Power's compliance with the provisions of this Policy and the adequacy of AMEA Power's arrangements with respect to whistleblowing. The Audit Committee shall ensure escalation to the Board of AMEA Power, as necessary.

AMEA Power's Risk Committee is responsible for approving the associated Complaints Procedures, and for reviewing AMEA Power's compliance with the provisions of this Policy and the adequacy of AMEA Power's arrangements with respect to complaints.

AMEA Power's Compliance Officer is responsible for the implementation of this Policy and its associated procedures. The Compliance Officer has overall responsibility for overseeing the investigation of all complaints and concerns, unless the concerns relate to the Compliance Officer. The Compliance Officer shall periodically report to the Audit Committee and Risk Committee of AMEA Power, as applicable, on the adequacy and effectiveness of the AMEA Power whistleblowing and complaints arrangements including details of the number, nature and status of whistleblowing concerns and complaints received.