

**ED&F
MAN**
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Standards of Business Conduct

Supplement

Whistle Blowing

This supplement Whistle Blowing is an integral part of ED&F Man's CSR Compliance Handbook and provides additional guidance to Standards of Business Conduct

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What is whistle blowing?

'Whistle blowing' refers to cases where an individual exposes malpractice within an organisation.

For the purposes of this policy, 'malpractice' is defined as an action that is either:

- Illegal.
- Contrary to policy, regulation, procedure or instructions.
- Likely to endanger service users, members of the public and / or colleagues.

For example, an action that is breaching the regulations of the Financial Conduct Authority (FCA), the Financial Industry Regulatory Authority (FINRA) or the Monetary Authority Singapore (MAS) would be considered malpractice in terms of legality and internal regulation and procedure would also be included in this definition.

The company believes in an open, dynamic and responsible culture within the business. It, therefore, welcomes the voicing of genuine and serious grievances on actual or perceived breaches of company policy. It expects its employees at all times to act within the law, applicable codes of practice, and to apply the highest possible operating/business ethics in all areas of its activities.

No employee or manager in any unit will be criticised for loss of business resulting from complying with the company's policies.

How do I report malpractice?

In the first instance, you should raise any concerns regarding malpractice with your line manager or the appropriate manager within the business. If the matter is not resolved through this route, or if you do not feel that this route is appropriate, you should report any suspected malpractice in writing to legal.csr@edfman.com.

If you work in a regulated company, you should also note that the regulator also operates a dedicated whistle blowing telephone line and e-mail address. These are available for use by anyone who has concerns about possible wrongdoing and considers that they are unable to raise their concerns internally. The reference to such regulatory whistle blowing telephone line or email address is available on their website.

When is it appropriate to use the whistle blowing policy?

The whistle blowing policy is primarily for concerns where the interests of others or of the organisation itself are at risk.

Any personal grievance should be reported under the company's Human Resource grievance policy.

What will happen next?

legal.csr@edfman.com will open an investigation into the issue, involving people appropriate to the allegations, for example, the Money Laundering Reporting Officer (MLRO) for a malpractice allegation relating to money-laundering.

The investigation will be undertaken as swiftly as possible, and corrective action will be taken in the event that malpractice is uncovered. You will be informed of the findings of the investigation and of any action taken as a result, in as far as confidentiality permits.

What will happen to me if I report suspected malpractice?

Whistleblowing laws provide legal protection for individuals who expose malpractice, where most of such legislation states that employees raising genuine concerns about crime, civil offences, miscarriage of justice, danger to health and safety or the environment and the cover up of any of these will not suffer any detriment by their employers on the grounds of making a protected disclosure.

The Group endorses this view and will ensure that employees who raise genuine concerns do not suffer any detriment in their employment.

However, use of the whistle blowing policy maliciously and without basis may result in disciplinary action.