

1. PURPOSE

This Policy sets out the Company's approach to whistleblowing and reporting on non-compliance with any of our policies. We are committed to the highest standards of integrity in line with international best practice and applicable international and local law.

2. APPLICABILITY

This Policy is applicable globally to all Representatives and Business Partners of the Company. It applies to joint ventures where the Company has a controlling interest and to any project. Any deviation from this Policy requires the approval of the Responsible Officer.

The Company has in place Alinea International Management (AIM) Guidelines, detailing Standard Operating Procedures (SOPs), Business Processes and Tools to support implementation of this Policy.

Guidelines, SOPs, Business Processes and Tools may vary with different operating environments if required by local legislation, client rules and regulations and other factors, subject to the approval of the Director, Risk Management.

3. DEFINITIONS

"Alinea International Management (AIM) Guidelines" means the Business Processes, SOPs and Tools used to manage project operations.

"Business Partner" means any Representative, subcontractor, grantee, sub-grantee, awardee, sub-awardee, adviser, vendor, supplier, landlord or other organization providing goods or services to the Company.

"Business Process" means a sequence of linked tasks and related decisions that result in or contribute to the delivery of a product or service.

"Company" refers to Alinea International Ltd. and all of its subsidiaries or related companies.

"Employee" means any person who has a part-time, full-time, intermittent, continuous, or fixed-term employment relationship with the Company.

"Guidelines" means the written elaborations on Company policy that provide further information and interpretation for the implementation of policy.

“Representative” means an Employee or any person who has an independent individual contractual relationship with the Company, whether as a contractor, consultant or agent of the company. This includes non-executive directors of the board.

“Responsible Officer” means the Representative who is accountable for execution of the Company policy.

“Risk” means an uncertain event that has the potential have an effect upon a desired outcome.

“Standard Operating Procedures” or “SOPs” are the detailed written descriptions of Business Processes that aim to ensure consistency and quality in process execution.

“Tool” means templates, forms, charts, informational and any other material prescribed for use in conjunction with an element of a Policy, Guideline, Business Process and SOPs.

“Whistleblower” means a person who exposes information about an activity within Alinea’s operations that is deemed illegal, unethical, or not correct.

4. POLICY OBJECTIVES

Alinea’s Whistleblower Policy provides guidance to Alinea Representatives, and Business Partners on how to deal with known or suspected improper conduct.

The Policy objectives are to:

- create awareness of the Policy and available Whistleblower protections;
- act as a reference guide to potential Whistleblowers wishing to make a disclosure;
- define the structure of the Whistleblower system, including reporting and investigation procedures, Whistleblower protections, and confidentiality, among others;
- improve the communication and transparency in the processes associated with whistleblowing and assure protection against derogatory consequences, namely reprisals and detrimental action;
- complement the current communication channels between Representatives and Business Partners and hierarchical channels flowing to the President and Management Committee; and
- provide guidance to all parties involved in either whistleblowing or Whistleblower protection.

4.1 Confidentiality and Non-Retaliation

Maintaining confidentiality is crucial to ensure reprisals are not made against a Whistleblower. Alinea is committed to safeguarding the identity of any Whistleblower and to protecting the Whistleblower against detrimental action taken in reprisal for allegations of suspected improper conduct or mismanagement of organizational resources.

The Director, Risk Management and the Management Committee are responsible for ensuring Whistleblowers are protected from direct and indirect detrimental action, and that the culture of the workplace is supportive of suspected allegations being made. Any Employee who retaliates against someone who has reported a violation in good faith is subject to disciplinary action, up to and including termination of employment.

4.2 Scope

Alinea requires all Representatives and Business Partners to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. The Whistleblower Policy covers both internal and external whistleblowing, and establishes the controls and procedures for dealing with allegations of malpractice, fraud and violations of our Code of Conduct and/or laws or regulations applicable to the countries in which we operate.

Any allegations of known or suspected improper conduct or mismanagement of organizational resources will be dealt with in accordance with this Policy, and reasonable steps will be taken to protect those who come forward with allegations.

This Policy is intended to encourage Representatives and Business Partners to report known or suspected improper conduct or mismanagement of organizational resources and to enable Alinea to address and correct inappropriate action.

5. DUTY TO COMPLY

It is the responsibility of all Representatives and Business Partners of the Company to fully comply with the Policy. Failure to comply may be subject to disciplinary action including contract termination, contract non-renewal or other appropriate action.

6. REPORTING

Alinea recognizes the value of transparency and accountability in our administrative and management practices and we support the making of disclosures that reveal improper conduct or mismanagement of organizational resources.

Reporting procedures are detailed in the Risk Management Guidelines.

Hotline posters are displayed at all Company and project offices. Messages received from whistleblowers and complainants may cover a range of areas from alleged fraud and complaints about service (whistleblowers) to complaints about sexual abuse, exploitation or harassment. These messages may include specific details or may be very general in nature. All communications from whistleblowers and safeguarding complainants are reviewed by the Director, Risk Management.

If the complaint or concern relates to anybody who is responsible for handling such complaints it should be referred to the President or another senior manager in the Company.

The Director, Risk Management notifies the President, develops a response, and enters data into the safeguarding and whistle-blower registers. In developing a response, particular attention will be paid to the protection and well-being of the complainant. Investigation of whistleblower complaints will be undertaken by internal and/or external staff as appropriate. Safeguarding investigations will be undertaken by an appropriately independent professional. The Director, Risk Management reviews any specific remedial actions recommended as a result of any investigation, discusses them with the President and makes arrangement for their implementation as appropriate. The Director, Risk Management responds to all whistleblower and safeguarding complaints initially, acknowledging receipt of the allegation, detailing the action proposed and keeps the complainant informed of conclusions and any associated actions proposed to obtain completion.

Representatives are required to report violations of this Policy to their manager. If the complaint or concern relates to anybody who is responsible for handling such complaints it should be referred to the Company's General Counsel who is a non-executive director of the Company. Alternatively, this requirement can be satisfied by reporting violations via the Company's Whistleblower mechanism.

Whistleblower email: ethics@alineainternational.com

Or through the Company Website: alineainternational.com

or

If there are concerns relating to a British Government project these may also be directed to:

Foreign Commonwealth and Development Office

Counter Fraud & Whistleblowing Unit (CFWU) at reportingconcerns@fcdo.gov.uk

or +44 (0) 1355 843747

Modern Slavery Helpline on +44 (0) 8000 121 700 or

website: www.modernslaveryhelpline.org