



MAY

2017

# WHISTLEBLOWING POLICY

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## 1 | INTRODUCTION

1.1. ALCO LLC (the "Company") is committed to upholding the highest standards of ethical conduct, integrity, and transparency in all its business operations. As part of this commitment, the Company encourages and supports the reporting of any concerns related to misconduct, violations of Company policies, or any illegal or unethical activities within the organization. The Whistleblowing Policy aims to provide a safe and confidential reporting mechanism for employees, contractors, suppliers, customers, and other stakeholders (hereinafter referred to as "Whistleblowers") to raise genuine concerns without fear of retaliation.

1.2. This policy is in alignment with the laws, regulations, and international best practices related to whistleblowing and is applicable to all individuals associated with ALCO LLC, including but not limited to employees, contractors, consultants, suppliers, customers, and business partners.

## 2 | POLICY OBJECTIVES

2.1. To Encourage Reporting: The primary objective of this policy is to encourage Whistleblowers to report concerns about misconduct or unethical behavior, ensuring that all employees and stakeholders actively participate in maintaining the integrity of the Company.

2.2. Prompt and Impartial Investigations: The Company is committed to conducting thorough and impartial investigations into all reports of misconduct promptly. Investigations will be carried out by designated individuals or committees, ensuring fairness and confidentiality.

2.3. Protect Whistleblowers: ALCO LLC is dedicated to protecting the confidentiality and anonymity of Whistleblowers to the extent permitted by law. The Company strictly prohibits any form of retaliation against individuals who report concerns in good faith.

2.4. Compliance and Best Practices: This policy ensures the Company's compliance with applicable laws and regulations related to whistleblowing while adhering to international best practices in handling such matters.

## 3 | SCOPE OF POLICY

3.1. This Whistleblowing Policy covers any report of:

- a) Fraud, embezzlement, or financial misconduct, including misappropriation of Company funds or assets.
- b) Bribery, kickbacks, or corruption, either within ALCO LLC or involving the Company's employees or stakeholders.
- c) Violation of laws, regulations, or Company policies, including breaches of data protection, safety protocols, or environmental regulations.
- d) Health and safety concerns related to the workplace or the Company's products or services.

- e) Discrimination or harassment based on gender, race, ethnicity, religion, age, disability, or any other protected characteristic.
  - f) Retaliation against Whistleblowers who have made reports in good faith.
  - g) Environmental violations, including illegal waste disposal or pollution.
  - h) Any other unethical or illegal conduct that poses a risk to the Company's reputation, financial stability, or legal compliance.
- 3.2. Whistleblowers may report concerns that occurred in the past, are currently happening, or are likely to occur in the future.

## **4 | REPORTING MECHANISM**

4.1. The Company encourages Whistleblowers to report concerns through the following channels:

- a) Directly to their immediate supervisor or manager: Whistleblowers can report their concerns to their direct supervisor or any higher-level manager within the Company.
- b) The Human Resources department: Whistleblowers may choose to approach the Human Resources department to report concerns if they are more comfortable doing so.
- c) The Compliance Officer: The Company shall designate a Compliance Officer, who will be responsible for receiving and handling whistleblowing reports independently.
- d) Anonymous and confidential hotline or web reporting platform: ALCO LLC may provide an anonymous and confidential hotline or web reporting platform, managed by a third-party provider, to allow Whistleblowers to report concerns without disclosing their identity.

4.2. Whistleblowers are encouraged to provide as much specific and detailed information as possible in their reports to facilitate a thorough investigation.

4.3. Protection of Whistleblower Identity: The Company will take all reasonable measures to protect the confidentiality of Whistleblowers and their identities, to the extent allowed by law. If a Whistleblower chooses to remain anonymous, the Company will still investigate the report to the best of its ability.

4.4. Non-Retaliation: The Company strictly prohibits any form of retaliation, harassment, or adverse treatment against Whistleblowers who report concerns in good faith. Any employee found engaging in retaliatory actions will be subject to disciplinary action, up to and including termination.

4.5. False Reports: Whistleblowers are expected to act in good faith and provide accurate information. Knowingly making false or malicious reports may result in disciplinary action against the individual making the false report.

## 5 | REPORTING PROCESS

5.1. Receipt and Acknowledgment: Upon receiving a whistleblowing report, the designated recipient, such as the Compliance Officer or Human Resources, will promptly acknowledge receipt of the report. The Whistleblower will be provided with information about the process and the expected timeframe for the investigation, to the extent allowed by law.

5.2. Initial Assessment: The designated recipient will conduct an initial assessment of the report to determine its credibility and seriousness. If the concern falls under the scope of this policy and is deemed credible, the matter will be escalated for further investigation.

5.3. Investigation Committee: The Company shall establish an Investigation Committee comprising impartial and knowledgeable individuals to oversee the investigation process. The Committee may include representatives from the Compliance, Legal, and Human Resources departments.

5.4. Whistleblower Involvement: The Investigation Committee may seek additional information from the Whistleblower if needed during the investigation process. Whistleblowers are encouraged to cooperate with the Committee to ensure a thorough and effective investigation.

5.5. Confidentiality During Investigation: To protect the interests of all parties involved and the integrity of the investigation, information related to the investigation will be shared on a need-to-know basis.

5.6. Timely Resolution: The Company will make every effort to conclude the investigation in a timely manner. However, the complexity and nature of the concern may impact the investigation timeline.

5.7. Final Report and Action: Once the investigation is complete, the Investigation Committee shall prepare a final report detailing the findings and recommended actions. If misconduct is substantiated, the Company will take appropriate disciplinary action, which may include corrective measures, counseling, training, or termination of employment or business relationships.

5.8. Feedback to Whistleblowers: Whistleblowers will be provided with appropriate feedback on the outcome of the investigation to the extent allowed by law and Company policy.

## 6 | COMMUNICATION AND TRAINING

6.1. Awareness: The Company will communicate this Whistleblowing Policy to all employees, contractors, suppliers, and other stakeholders through internal communications channels, including the Company's intranet.

6.2. Training: Training on the Whistleblowing Policy and reporting procedures will be provided to all relevant employees and stakeholders during onboarding and periodically thereafter.

## **7 | CONFIDENTIALITY AND ANONYMITY**

7.1. Protection of Whistleblower Identity: The Company shall make every reasonable effort to protect the confidentiality and anonymity of Whistleblowers. Disclosure of the Whistleblower's identity will only occur when required by law or essential for the investigation.

7.2. Confidentiality of Reports: All information related to the whistleblower report and investigation will be treated with strict confidentiality to the extent permitted by law.

## **8 | NON-RETALIATION AND WHISTLEBLOWER SUPPORT**

8.1. Non-Retaliation: The Company strictly prohibits any form of retaliation against Whistleblowers who report concerns in good faith. Any employee found to be engaging in retaliatory actions will be subject to disciplinary action, up to and including termination.

8.2. Whistleblower Support: Whistleblowers will be provided with access to counseling, legal assistance, or other necessary support to protect their rights and well-being.

## **9 | POLICY DISTRIBUTION**

9.1. Distribution: This Whistleblowing Policy shall be made available to all employees, contractors, suppliers, customers, and other stakeholders through the Company's intranet or other accessible means.

9.2. Acknowledgment: Covered Persons shall be required to acknowledge receipt and understanding of this policy as part of their onboarding process.

## **10 | POLICY REVIEW AND EFFECTIVENESS**

10.1. Review Frequency: This Whistleblowing Policy shall be reviewed annually and updated as needed to reflect changes in laws, regulations, and best practices.

10.2. Policy Effectiveness: The Company shall monitor the implementation and effectiveness of this policy to ensure its continued relevance and impact.

## **NOTES & INSTRUCTIONS**

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