



# WHISTLEBLOWER POLICY

## 1.0 PURPOSE

Shaw Pipeline Services (SPS) is committed to the highest standards of ethical, moral & legal business conduct as evidenced by its Code of Conduct. This Policy aims to enhance the Company's transparency and system for combatting practices that might damage its reputation and its long-term viability by providing an avenue for Responsible Persons to raise genuine concerns anonymously through a Whistleblower Report form. Importantly, it also aims to provide reassurance of protection from reprisals or retaliation for whistleblowing in good faith.

The Policy is intended to cover serious concerns that could have a significant impact on SPS. The following are just a few examples of serious concerns;

- Actual or suspected criminal activities
- Unlawful or unethical acts or omissions
- Fraud
- Violations of the Code of Conduct or other Company policies & procedures
- Danger to health, safety, or the environment
- Improprieties in the workplace, including relative to matters of financial reporting, internal control, or auditing.

Regular business or employment matters not requiring anonymity should continue to be directed to Supervisors, HR or managed through any grievance process that has been established within the Company.

The Board of Directors is responsible for the implementation, monitoring and oversight of this Policy. Any questions regarding the content of application of this Policy should be directed to your HR representative.

## 2.0 SCOPE

This policy applies to all current and former employees, officers, directors and other persons acting on behalf of the Company regardless of geographic location. The following companies are included;

- Shaw Pipeline Services UK Ltd (UK)
- Shaw Pipeline Service Inc. (US)
- Shaw Pipeline Services Ltd (Canada)

In addition, the policy applies to consultants, contractors, suppliers, customers and service providers (collectively known as Responsible Persons)

## 3.0 SAFEGUARDS

### 3.1 HARASSMENT OR RETALIATION

Harassment, retaliation, or any other form of reprisal against individuals submitting reports will not be tolerated. Anyone voicing substantiated or good faith concerns will not face retribution



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because of voicing their concerns. By the same token, no actions will be taken against those accused of wrongdoings until a complete investigation has taken place. The timing and severity

of actions, if any, maybe influenced by a variety of factors not always visible to all involved. Investigations may or may not result in disciplinary actions.

Any person found to be engaging in harassing or retaliatory behaviour may be subject to discipline up to and including termination in extreme circumstances.

## 3.2 CONFIDENTIALITY

Anyone making a Whistleblower report may remain anonymous if they choose. If anonymity is requested, every effort will be made to protect the reporters identity. Please note that the information provided in the Whistleblower report may be the basis of an internal and / or external investigation. It is possible that as a result of the information provided in the report that the reporters identity may become known to the Company during the course of our investigation. The identity of the reporter will only be disclosed if the reporter consents or if it is required for an investigation. The reporter will be informed before their identity is disclosed unless the investigative team determines that informing the reporter would compromise the investigation.

## 3.3 ANONYMOUS ALLEGATIONS

Anonymous concerns will be investigated with consideration given to;

- The seriousness of the issue raised;
- The credibility of the concerns; and
- The likelihood of confirming the allegation from attributable sources

## 3.4 MALICIOUS ALLEGATIONS

Malicious allegation may result in disciplinary action up to and including termination in extreme circumstances.

## 4.0 REPORTING PROCESS

If a Responsible Person becomes aware of conduct that violates the principles articulated under the heading "purpose" above, that person is responsible to make a prompt disclosure.

A Report Form is available via the following links;

[Whistleblower Report Form](#)





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Responsible Persons are encouraged to raise concerns in a timely fashion. The earlier a concern is expressed, the easier it is to take action including the preservation of evidence and mitigation of potential harm to the Company and its various stakeholders.

## 5.0 HOW THE REPORT IS HANDLED

The action taken will be dependent on the nature of the concern. The following people will receive a copy of all reports.

- Chairman of the SPS Board of Directors
- The CEO
- The CFO
- The Global HR Manager

Upon receipt of a report, provided they are not the subject of the report, the CEO, CFO and Global HR Manager will determine the appropriate investigation plan. The Chair of the Board will be kept apprised of the status of the investigation and will receive follow up reports on the actions taken.

If the aforementioned people are implicated in the allegations, then the Chair of the Board will lead the investigation and determine the appropriate action to take.

## 5.1 FEEDBACK TO REPORTER

Whether reported directly to SPS personnel, or through the Whistleblower Report Form, a reporter who has provided their name and contact details, will receive follow-up on their concern, provided such follow-up information will not compromise an investigation or legal proceedings or violate the privacy of an individual who is being investigated.

The amount of contact between a reporter and the person investigating the concern will depend on the nature of the issue, the clarity of the information provided and whether the reporter remains accessible for follow-up. Further information may be sought from the reporter although there is no obligation on the reporter to provide any further information.

## 6.0 AMENDMENTS TO POLICY

The Company reserves the right to make amendments to this policy in line with legislative changes or Company decisions.

## 7.0 RELATED POLICIES

PO-HRGL-001 – SPS Global Code of Conduct

PO-HRGL-003 – SPS Global Employment & Labour Policy

PO-HRGL-004 – SPS Global Anti-Corruption & Bribery Policy

PO-IT-001 – SPS Global IT Acceptable Use and Security Policy