



EXTERNAL WHISTLEBLOWING POLICY

Introduction

OPITO is the global, not for profit, skills body for the energy industry. An industry-owned organisation with operations centres in four regions (UK and Europe, Middle East and Africa, Asia Pacific and the Americas) – we are driving safety and competency improvements to benefit the industry.

As part of our role in ensuring specific safety and competency standards are maintained we undertake reviews and audits of those providing training and accreditations to the offshore industry and approve those providers that meet our standards and criteria. The standards and criteria we are custodian for have been developed and adopted across the offshore industry following engagement with governments, national oil companies, operators and contractors.

We take whistleblowing very seriously. This policy describes what we can look at as part of our role in upholding standards in the offshore industry. It describes whistleblowing and explains how you can raise your concerns with us under this policy and how we will handle that concern.

Does this policy apply to me?

This policy sets out how OPITO will deal with whistleblowing concerns from third parties in respect of organisations or individuals that OPITO has approved or acknowledged as accredited. This includes those who work within, or have worked within, organisations involved in the provision of OPITO approved training courses.

Following the approach in whistleblowing legislation, we encourage individuals to consider blowing the whistle internally within their own organisations if the matter relates to their employment or an issue within their own organisation. However, if you have raised concerns within your organisation and are not satisfied with the response, or if you feel unable to raise your concern within your organisation, you are able to contact us under this policy.

What is whistleblowing?

Whistleblowing is the term used to describe instances where an individual has worked within or with an organisation and subsequently discloses information that they reasonably believe is in the public interest to disclose and that they reasonably believe could constitute breaches of legal obligations, dangers to health and safety and the environment, or where there is concealment of information by the organisation which could demonstrate any of these issues.

Whistleblowing is different from raising a grievance as the actions giving rise to the concerns do not have to have directly affected the individual blowing the whistle. Its aim is to prevent harm to others or to an organisation or industry as a whole.

If you wish to make a complaint relating to your employment, that should be raised directly with your employer.



What type of concerns can I raise?

You must reasonably believe that the disclosure of information is **in the public interest**. Further, the concerns you allege must relate to OPITO's activities in approving and monitoring the providers of training and accreditation to the oil and gas industry.

In addition, you must believe that your disclosure demonstrates past, present or future actions in respect of one or more of the following:

- failure to comply with a legal obligation;
- danger to the health and safety of an individual or group of individuals;
- damage to the environment; and / or
- deliberate concealment of any of the above.

Moreover, if you wish to raise concerns regarding the standards of quality and safety in respect of training provided by an OPITO approved provider this should be notified pursuant to this policy.

For the avoidance of doubt, OPITO does not deal with any concerns relating to criminal activity and these should be raised directly with the police.

How should I raise my concerns under this policy?

If you do decide to make a disclosure under this policy, please provide the information in writing to us using the details below, even if you have initially contacted us by telephone, so that we can properly consider your concerns.

If you are unable, for whatever reason, to provide information to us in writing, please let us know and we will consider what, if any, alternative arrangements may be appropriate. We can be contacted at:

Address: OPITO, Minerva House, Bruntland Road, Portlethen, Aberdeen, Scotland, AB12 4QL

Email: whistleblowing@opito.com

Telephone: +44 1224 787800

Website: www.opito.com

Please set out your concerns about the organisation as fully and as clearly as possible, including:

- the issue(s) you reasonably believe have arisen with your view on which of the actions or activities have been demonstrated by such issues; and
- to which part or parts of OPITO's role (approval of training providers, monitoring of standards, upholding of standards and criteria etc.) you reasonably believe your concerns relate.



If the issues relate to your employer and you have raised your concerns with your employer previously, for example under its whistleblowing policy, please tell us and also describe what happened as a result.

Will we always act on anything you tell us?

Our response to any disclosure you make will depend on whether it comes within this policy and, if so, our assessment of the seriousness of the concerns you raise.

We will need to decide if:

- the concern is within the scope of OPITO's role in the oil and gas industry;
- OPITO is the right organisation to investigate the concerns; and/or

another organisation or regulatory body is better placed to deal with the concerns instead or, or as well as, us

What kind of action can we take?

We can generally do one or more of the following:

- make a record of your concern to add to our database of information on an organisation covered by our activities / duties;
- raise the issue directly with the organisation if we consider this appropriate; and/or
- notify another body or a regulator if it is appropriate to do so.

How will we keep you updated?

We will:

- acknowledge receipt of your disclosure within five working days;
- in due course on conclusion of our investigation, advise you if we have notified any other body or regulator in respect of the disclosure; and
- in due course on conclusion of our investigation, provide an outline of action taken following consideration of the information provided by you (having regard to confidentiality and data protection).

The length of time it will take for us to respond will depend upon the nature of the concern you have raised and the type of action, if any, OPITO chooses to take.

Will we keep your identity confidential?

If you ask us to conceal your identity we will endeavour to do so unless disclosure of your identity is required by law. In such situations, while we cannot guarantee that others may not be able to identify you from the information disclosed if we look further into the concerns you raise, we aim to exercise discretion when doing this. If we require your personal engagement in looking into any



matter, we will aim to discuss this with you and determine whether and how the matter may proceed.

You may wish to remain anonymous when making a report of your concerns. Please remember that if you do, it is likely more difficult for us to look into the concerns raised and validate the information provided. Also, we will not be able to contact you for further information or to provide feedback.

Who is responsible for this policy?

OPITO's CEO is responsible for this policy and ensures it is under regular review.