

**LONGBOAT ENERGY PLC**  
**WHISTLEBLOWING POLICY & PROCEDURE**

Longboat Energy plc (“**Longboat**” or the “**Company**”) has a duty to identify malpractice and take the appropriate measures to remedy the situation. By encouraging a culture of openness within our organisation the Company aims to prevent malpractice. The Company wants to encourage all workers to raise issues, which concern them at work through the Whistle-blower Policy.

The Whistle-blower policy will apply in cases where an employee genuinely and in good faith believes that one of the following sets of circumstances is occurring, has occurred or may occur within the Company:

- that a criminal offence has been committed, is being committed or is likely to be committed
- that a person has failed, is failing or is likely to fail to comply with any legal obligation to which he or she is subject
- that a miscarriage of justice has occurred, is occurring or is likely to occur
- that the health and safety of any individual has been, is being or is likely to be endangered
- that the environment has been, is being or is likely to be damaged
- that information tending to show any matter falling within any one of the preceding paragraphs has been, is being or is likely to be deliberately concealed.

While it is not necessary that the employee proves the malpractice or misconduct that he/she is alleging, but may simply raise a reasonable suspicion, please note that an employee will not be protected from the consequences of making such a disclosure if, by doing so, he/she commits a criminal offence. Employees will only be entitled to protection if the disclosure is carried out in accordance with the policy in good faith.

All employees have legal protection (in Norway under the Norwegian Working Environment Act and in the UK under the Public Interest Disclosure Act) from any form of retribution, victimisation or detriment as a result of publicly disclosing certain serious allegations of malpractice. Employees who disclose information of a specified category to a specified individual in specified circumstances will be afforded protection. It will also enable them, if necessary, to make a complaint or assist in an investigation without fear of reprisal.

**Who the disclosure should be made to:**

If any employee of the Company wishes to raise or discuss any issues, which might fall into the above category they should contact their line manager in the first instance who will treat the matter in confidence. In such cases it is likely that further investigation will be necessary, and the employee may be required to attend a disciplinary or investigative hearing as a witness. The complaint should be made orally or in writing, describing the incident(s) as fully as possible to their line manager. Where the concern involves the line manager then the concern should be raised with a more senior manager and ultimately the Senior Non-Executive Director. All complaints will be viewed seriously and treated confidentially.