




SPEAK UP POLICY



Document Number:	AR-P-01
Revision Number:	0
Business Unit:	Group Internal Audit and Risk
Release Date:	05-Dec-2016
Document Type:	Policy

Author:	Audit and Risk Committee
Approver (1):	Christopher Tucker
Approver (2):	Roger Packer
Issued by:	Indira Ramjit-Prudent

CONTROLLED DOCUMENT

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PURPOSE

A Speak Up policy is a critical tool for protecting individuals who report activities believed to be illegal, dishonest, unethical or otherwise improper, the consequences of which will negatively impact the organization. Tucker Energy Services is committed to uphold the highest level of integrity in its business operations, and therefore ensures that there is a process in place for identifying, reporting and investigating illegal or dishonest activity and for implementing corrective action.

SCOPE

All employees at all levels and functions of Tucker Energy Services including Contractors, Suppliers and Subcontractors, are bound by this policy.

RESPONSIBILITY

The following persons are responsible for the effective implementation of this policy.

DIRECTORS AND MANAGEMENT

- Ensure that the necessary commitment and support is maintained for the effective implementation of this policy.
- Provision of resources for the implementation and maintenance of the system.
- To uphold the principles espoused in the policy.
- Provide all resources needed for the implementation of this policy.
- Ensure the policy is fully implemented.
- Communicate the policy to employees.


HR DEPARTMENT

- Include in employee induction sessions as required to inform new employees of this policy.

ALL EMPLOYEES

- To report concerns about violations of TES's Code of Conduct and Ethical Business Practice or suspected violations of law or regulations that govern TES's operations.

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POLICY

Tucker Energy Services requires Directors, Officers, Employees, Suppliers, Contractors and Subcontractors to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of TES, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Objective

This policy is intended to encourage and enable employees and others to raise serious concerns internally so that TES can address and correct inappropriate conduct and actions, before the issue escalates internally or externally, and to establish policies and procedures for:

- The submission of concerns regarding questionable, illegal or unethical practices by employees, directors, officers and other stakeholders of the organization.
- The receipt, retention and timely treatment of complaints received by the organization regarding these matters.
- The protection of employees reporting good faith concerns from retaliatory actions.


Do not use this policy:

- To report events presenting an immediate threat to life or property. If you need emergency assistance, please contact your local authorities or call the emergency phone number.
- For any grievances you may have in relation to your terms of employment. Please see the Grievance Procedure.
- To settle personal disputes.
- To make accusations that you know are false. Doing so may lead to disciplinary measures up to and including termination of employment.
- Work Refusal Cases as stipulated under the Occupational Health and Safety Act

Confidentiality

Protections are provided to the individual that speaks up ("Speak Up Individual") in two important areas – confidentiality and against retaliation. In so far as possible, the confidentiality of the Speak Up Individual will be maintained. However, his/her identity may have to be disclosed to conduct a thorough investigation, to comply

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with legal requirements, or to provide accused individuals their legal rights of defense. In these circumstances the person speaking up will be notified prior to release of personal information.

Retaliation

It is contrary to the values of TES for anyone to retaliate against any board member, officer, employee or contractor, supplier, customer, who, in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, suspected fraud, or suspected violation of any regulations governing the operations of TES. An employee who intimidates or retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. TES will not retaliate against a Speak Up Individual. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, poor work assignments and threats of physical harm. The right of the Speak Up Individual for protection against retaliation does not include immunity for any personal wrongdoing by the Speak Up Individual.

If an individual raises a genuine concern under this policy and is acting in good faith, even if it is later discovered that they are mistaken, they will not be at risk of losing their job or suffering any form of retribution as a result of raising the concern.


False Reporting

This assurance will not be extended to an individual who maliciously raises a matter they know to be untrue or who is in any way involved in a false accusation or report. An employee who intentionally files a false report of wrongdoing will be subject to disciplinary action up to and including termination.

This Speak Up policy covers the following:

- Conduct which is an offense or a breach of law, e.g. fraud, corruption or theft or other criminal offenses
- Disclosures related to miscarriages of justice
- Breaches of legal obligations (including negligence, breach of contract, breach of administrative law)
- Health and safety risks, including risks to people/client as well as other parties
- Damage to the environment – green issues
- Verbal, sexual or physical abuse of employees or other ethical misconduct/behaviour
- Discrimination

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- Professional misconduct
- Nepotism
- Violation of the Company's Code of Conduct and Ethical Business Practice
- Hiring practices

This list is neither exclusive nor exhaustive and there may be other serious public interest concerns that would come under this policy.

PROCEDURE

How a disclosure will be submitted:


The Speak Up Individual will have several channels available to them to raise concerns about suspected misconduct. As a general guideline, the first person to approach when raising a concern is the Speak Up Individual's line manager. The Speak Up Individual may also discuss his/her concern with the Company HR representative, Internal Auditor, or In-house Legal Counsel.

In the event that you suspect misconduct and genuinely believe that the matter cannot be dealt with through the available channels within the company, the employee, third party contractor, customer, supplier or member of the public can submit a Speak Up report using the link provided: <https://speakup.tuckerenergy.com>. The link to the Speak Up website will be posted on the TES public website. After a report is completed on the website, the Speak Up Individual will be given a unique Code. The Speak Up Individual can use this Code to check progress on the report on the website.

What kind of information should be submitted:

When the Speak Up Individual files a report (in person, in writing, online or by phone), please provide as much detailed information as you have to enable the Company to assess and investigate your concern, such as providing the following:

1. The type of issue that is being reported. Types of Speak Up issues include, but are not limited to the following:
 - a. **Diversity, Equal Opportunity and Respect in the Workplace** which includes issues regarding Discrimination, Workplace Harassment, Sexual Harassment, Retaliation or Retribution.

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- b. **Employee Relations** which includes issues regarding Conflict of Interest (personal), inappropriate behavior and unfair employment practices.
- c. **Quality, Health and Safety and Environmental** which includes issues regarding Quality, Health and Safety, Environment, Substance Abuse and Threats and Physical Violence.
- d. **Financial Concerns** which includes issues regarding Accounting and Auditing Practices, Conflict of Interest (Financial) and Gifts, Bribes and Kickbacks.
- e. **Misuse or Misappropriation of Assets** which includes issues regarding Customer Relations, Disclosure of Confidential Information, Misuse of Resources, and Theft.
- f. **Policy and Process Integrity** which includes Antitrust or Fair Trading, Espionage or Sabotage, Falsification or Destruction of Information and Quality Control.
- g. **Other issues** such as a Guidance Request or any other concerns that are not currently resulting in harm, injury or corporate liability and cannot be included in any other category.


2. The background and history of the issue:

- a. Persons involved in the incident must be specified by providing their role in the incident, name and job title.
- b. The location of the incident.
- c. A description of the date and time of the incident and a clear summary of the event or sequence of events which occurred. Note: If you have any personal interest in the matter you have raised you must disclose this at the outset. This procedure is not intended to replace the Grievance Procedure, which continues to be the appropriate way to raise personal issues relating to your specific job or employment.
- d. If applicable, any supporting evidence to the claim should be submitted.

The Company encourages you to speak up as soon as possible. If you know about or suspect misconduct, speak up with the facts that you have. The Company does not expect you to have all the answers; however, a claim can only be followed up if it contains a sufficient amount of information or if there is a reasonable possibility of obtaining further information, so please provide as much information as possible.

Investigation of a Speak Up Claim

The Company takes every report of possible misconduct seriously. The Company aims to start the investigation within two weeks of the disclosure. The length and scope of the investigation will depend on the subject matter of the disclosure. In most instances, there will be an initial assessment of the disclosure to determine whether there

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are grounds for a more detailed investigation to take place or whether the disclosure is, for example, based on erroneous information.

The investigating team has the authority to retain outside legal counsel, accountants, private investigators or any other resource deemed necessary to conduct a full and complete investigation of the allegation.

You may be asked to provide more information during the course of the investigation.

The investigation report will be reviewed by the person managing the disclosure.

Appropriate action will be taken – this could involve initiating a disciplinary process or informing external authorities if a criminal action has been committed e.g. fraud or theft. We will endeavour to inform you if a referral to an external authority is about to or has taken place, although we may need to make such a referral without your knowledge or consent if we consider it appropriate, to protect the confidence of other individuals involved or where required by law.


If it is found that there is not sufficient evidence of misconduct, or the actions of the individual(s) are not serious to warrant disciplinary action, it may be more appropriate for the manager of the person(s) committing the infraction to take a more informal approach to dealing with the matter.

You will be informed of the overall outcome of the investigation, except where prohibited by law or if we consider it inappropriate. Possible outcomes of the investigation could be that:

- The allegation could not be substantiated, or
- Action has been taken to ensure the problem does not arise again. You will not, however, be given details about the action taken, as this could breach the legal or human rights of the person(s) involved, or due to confidentiality or privacy.

If you are not satisfied with the response you have received, you should raise the matter with the Head of Internal Audit outlining your reasons.

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Confidentiality during the investigative process

Every effort will be made to keep your identity confidential. To help ensure that the investigation into the alleged infraction is not jeopardized, please keep the fact that you have raised a concern, the nature of the concern, and the identity of those involved confidential.

There may be circumstances in which, because of the nature of the investigation or disclosure, it will be necessary to disclose your identity. This may occur in connection with associated disciplinary or legal investigations or proceedings. If in our view such circumstances exist, we will make efforts to inform you that your identity is likely to be disclosed. If it is necessary for you to participate in an investigation, the fact that you made the original disclosure will, so far as is reasonably practicable, be kept confidential, and all reasonable steps will be taken to protect you from any victimization or detriment as a result of having made the disclosure. It is possible, however, that your role could still become apparent to third parties during the course of an investigation. Equally, should an investigation lead to criminal prosecution, it may become necessary for you to provide evidence or be interviewed by the Police. In these circumstances, again, the implications for confidentiality will be discussed with you.

Anonymous Reporting


Where allowed by law, you can share your concerns anonymously. Anonymous disclosures are very difficult to act upon as there may be little or no corroborated evidence to substantiate the allegations. Proper investigation may prove impossible if the investigator cannot obtain further information from you, give you feedback or ascertain if your disclosure is made in good faith. The Company does not encourage anonymous reporting as it feels it is more appropriate for individuals to come forward with their concerns.

Limitations

This policy does not:

- Require the Company to compensate an employee for participation in a court action or in an investigation, hearing or inquiry by a public body.
- Prohibit the Company from compensating an employee for participation in a court action or in an investigation, hearing or inquiry by a public body.
- Authorize the disclosure of information that is legally required to be kept confidential.
- Diminish or impair the rights of an employee under a collective bargaining agreement.

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Limitations to protections:

- A person is not entitled to the protections under this policy unless he or she reasonably believes that the information reported is, or is about to become, a matter of public concern and reports the information in good faith.
- A person is entitled to the protections under this policy only if the matter of public concern is not as a result of conduct by the individual seeking protection, unless it is the result of conduct by the person that was required by his or her employer.
- Except where prohibited by law, before an employee initiates a report to a public body on a matter of concern under this policy, the employee shall submit a written report concerning the matter to the Company's Managing Director. However, the employee is not required to submit a written report if he or she believes with reasonable certainty that the activity, policy or practice is already known to the Managing Director, or that an emergency is involved.

Revision and change(s)

Changes and/or revision to this policy will be managed through the Audit and Risk Committee for review and consent. The revision and approval of the policy will be done in accordance with the Document Control Procedure.


TERMS AND DEFINITIONS

Terms	Definitions
Speak Up Individual	An employee, contractor, supplier, or customer of TES who reports an activity that he/she considers to be illegal or dishonest to one or more of the parties specified in this Policy.
Illegal or Dishonest Activity	Examples of illegal or dishonest activity are violations of Trinidad and Tobago Law, a danger to public health or safety, gross mismanagement, substantial waste of funds or a clear abuse of authority

KEY ABBREVIATIONS

NA

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RELATED DOCUMENTS

- 1) Business Principles Policy
- 2) Code of Conduct and Ethical Business Practice
- 3) Anti-Harassment Policy

RELATED RECORDS

N/A