

AS Tallinna Vesi

Whistleblowing policy

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1. Introduction

This Whistleblowing policy (hereinafter also referred to as **this Policy**) and the Code of Conduct of Tallinna Vesi set ethical standards that apply in AS Tallinna Vesi and its subsidiary OÜ Watercom (in this document together referred to as **Tallinna Vesi** or the **company**). This Policy and the Code of Conduct of Tallinna Vesi form a single document. Code of Conduct of Tallinna Vesi can be found on Company's website.

At Tallinna Vesi, we are proud of our strong commitment to having high ethical standards in the way that we work. We have outlined what those principles are set forth in our Code of Conduct, which summarises our approach of doing business. Everybody in Tallinna Vesi must read and be familiar with those principles. We expect our partners to act also according to high ethical standards and in accordance with law.

We cannot live up to our commitments to conduct our business legally with integrity and fairness if we, as individuals, do not speak up when we see or believe there is wrongdoing in our workplace. It is important for any of our employees and contractors who have any such concerns to feel they can talk in confidence to someone who can help. In this Policy 'Whistleblowing' means the reporting by employees, customers and business partners of suspected misconduct, illegal acts, failure to act, any wrongdoing or malpractice (hereinafter all together mentioned as **wrongdoing**) by employees and the management of Tallinna Vesi (hereinafter the **employees**) without fear of victimization, subsequent discrimination, disadvantage or dismissal.

2. Our position

Our goal is to be the best water and wastewater company in Estonia and in Baltics and a leading service provider. But we will not sacrifice integrity in order to achieve our business targets.

Even within the best organisations, individuals are sometimes tempted to cross the line between appropriate and inappropriate behaviour. If Tallinna Vesi is to maintain and enhance its reputation for having high standards of behaviour, it is essential that our people recognise they have a positive duty to act in such circumstances and feel able to raise any concerns about wrong-doing.

This policy outlines the way we encourage our employees to raise such concerns.

3. Our approach

Instances of wrongdoing, which you may know or suspect may have happened or are currently happening and which are covered under this policy include such things as:

- Financial or accounting fraud, corruption, bribery or any other inappropriate action or behaviour relating to financial matters;

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- Major inadequacies or weaknesses in the company's system of internal controls, relating to auditing or accounting matters, which could have an important or significant effect on the company's financial statements;
- A conflict of interest or unethical behaviour or failure to exercise professional skill or care, such as buying something from a relative's company or doing business with a company or business in which one has shares; or falsification of statistics to support achievement of business targets;
- The improper use of insider information in dealing in shares in Tallinna Vesi or of any other company;
- The improper use of confidential or commercially sensitive information;
- The failure to disclose information or the destruction of documents which should be disclosed to others within the company or to our regulators or other appropriate bodies;
- Any criminal offence or a failure to comply with our legal obligations as a business;
- A breach of the terms of any of our company's regulatory licences;
- The Health and Safety of anyone being put in danger or harmed;
- The failure to report when it is discovered that our activities have or may have caused damage to the environment, such as pollution or other contamination;
- A failure to comply with any of our policies, procedures or internal procedures, or of our Code of Conduct.
- Deliberately hiding information which relates to any of the above.
- Any other serious concerns.

4. How to report a concern – your responsibility

Raise your concern, the earlier you do so, the better. Every matter reported will be investigated and treated seriously and sensitively.

In the first instance, speak to your line manager or HR. We recognise the sensitivity of raising such concerns and we will treat details of individuals who report matters with the utmost confidence so that your identity is not revealed. If any proceedings follow the investigation, it may not be possible to take action as a result of your disclosure without your help, so you may be asked to come forward as a witness. If you agree to this, you will be offered advice and support.

If you do not feel this would be appropriate to speak to your line manager or HR, you can call the confidential whistleblowing line on +3727868602 which operates 24/7.

Calls are recorded and handled in the strictest confidence by an independent party Ernst&Young.

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Alternatively, you can report using the website form on company's website or send an e-mail to the address astv@vihja.ee. Filling in the form is also confidential and no IP address is stored, so that you can be confident, that your identity will not be revealed. The information will be sent directly to the independent party Ernst&Young, who will review all information and takes appropriate actions.

Your anonymity will be retained by Ernst&Young if requested and Tallinna Vesi will be provided with information to investigate allegations and take prompt action where necessary.

In order to have the best outcome of the investigation, it is important, that the information provided would be as precise as possible- where and when the incident happened, description of the incident, who are the involved people (names, positions), how the reporter become aware of the incident, are there any evidences about it and/or are there any other witnesses.

All concerns will be investigated whether they are raised through the internal route, the external independent whistleblowing line or the web portal. When anybody legitimately reports a wrongdoing, we will do our utmost to protect them from any reprisals. Should the case be that the reporter has also taken part of the wrongdoing, in this instance Tallinna Vesi can not promise not to act against such an employee but the fact that s/he came forward will be taken into account.

Tallinna Vesi recognises that the decision to report a wrongdoing can be a difficult one to make. If you honestly and reasonably believe what you are saying is true, you should have nothing to fear because you will be doing your duty to your employer, your colleagues and the customers of Tallinna Vesi.

Tallinna Vesi will not tolerate any harassment or victimization of a reporter (including informal pressures) and will take appropriate action to protect you when you raise a concern in good faith and will treat this as a serious breach of employment contract which will be dealt with under such applicable rules and procedures.

Tallinna Vesi will also not tolerate if you make an allegation frivolously, maliciously and/or for personal gain. Appropriate action may be taken by Tallinna Vesi.

5. What happens next – the company's responsibility

Once a concern is raised via the above means, the basis of that concern will be recorded, a decision made on what further actions are required and the relevant senior personnel informed – e.g. Human Resource Director; Head of Legal and Management Board or the Head of Audit Committee, if the concern is related to Management Board members.

Anybody who has reported any wrongdoing and not stayed anonymous will be advised of the outcome of the investigation as soon as practical.

6. Who is covered by this policy?

All our employees, whether permanent or temporary, and contractors

7. Monitoring and reviewing our policy

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All reports are monitored by our audit committee. The committee will also review this policy and its effectiveness every year

As part of our end-of-year processes, all members of our Executive Team are required to sign a letter of compliance in which they must verify that, to the best of their knowledge, their employees have applied our Code of Conduct and acted with integrity in all of their dealings