

## Whistleblowing Policy

### Introduction

Whistleblowing means the reporting of suspected misconduct, illegal acts, or failure to act, and it is often employees who are the first to realize that there is or may be something seriously wrong.

As the Company, Whistleblowing is viewed as a positive act that can make a valuable contribution to our efficiency and long-term success. It is not disloyal to colleagues or to the Company to speak up. We are committed to achieving the highest possible standards in all we do.

### Aims and objectives

The aim of this Policy is to encourage employees who have serious concerns about any aspect of to come forward and voice those concerns.

The Policy is designed to ensure that you can raise your concerns about wrongdoing or malpractice without fear or victimization, subsequent discrimination, disadvantage, or dismissal.

It is intended to encourage and enable you to raise serious concerns within the Company, rather than ignoring the problem or 'blowing the whistle' externally.

### The policy aims to

- Encourage you to feel confident in raising serious concerns at the earliest opportunity
- Ensure you receive a response to your concerns and that you are aware of how to pursue them if you are not satisfied
- Reassure you that you will be protected from possible reprisals or victimization if you have made a disclosure in good faith

This Policy is intended to enable those who become aware of wrongdoing at the Company affecting some other person to report their concerns at the earliest opportunity so that they can be properly investigated.

### Our commitment to you

We are committed to good practice and high standards to being supportive of you as an employee. We offer comprehensive whistleblowing training to all employees.

We recognize that the decision to report a concern can be a difficult one to make. If you honestly and reasonably believe that 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 those for whom you are providing a service.

We will not tolerate any harassment or victimization of a whistleblower and will take appropriate action to protect you when you raise a concern in good faith and will treat this as a serious disciplinary offence which will be dealt with under the disciplinary rules and procedures.

### Our support to you

Throughout this process:

- You will be given full support from senior management
- Your concerns will be taken seriously; and
- The Company will do all it can to help you through any investigation

### **What should be reported**

You should report any serious concerns you have, such as:

- Conduct which is an offence or a breach of law (a criminal offence that has been committed or failing to comply with any other legal obligation)
- Disclosures relating to miscarriages of justice
- Racial, sexual, disability, or any other discrimination
- Health and safety of employees or anyone else who comes into our workplace
- Damage to the environment
- Unauthorized use of our assets, such as the company credit card
- Possible fraud or corruption
- Neglect or abuse of clients, or
- Any other unethical conduct

### **Making a disclosure**

You should normally raise concerns with:

- Your immediate manager
- Your department manager
- A director

You may make your disclosures in person, by telephone or in writing. The earlier you express your concern, the easier it is to take action. You will need to provide the following information:

- The nature of your concern and why you believe it to be true
- The background and history of the concern (with relevant dates); and
- Any evidence you may have

You are not expected to prove the truth of your suspicion, but you will need to show to the person you raise your concern with that you have a genuine concern related to suspected wrongdoing or malpractice and that there are reasonable grounds for your concern.

### **Making an anonymous disclosure**

The Company shall appoint an independent officer who shall receive all concerns via a hotline or web-based platform that they control.

The Independent Officer shall be responsible for ensuring confidentiality of the whistleblower and shall provide information to General Counsel as required.

The whistleblowing contact details will be readily available to all employees.

### **What the Company will do**

The Company will respond to your concerns as quickly as possible. In order to be fair to all employees, including those who may be wrongly or mistakenly accused, initial enquiries will be made to decide whether an investigation is appropriate, and if so, what form it should take.

The investigation may need to be carried out under terms of strict confidentiality (i.e., not informing the subject of the complaint until or if it becomes necessary to do so. In certain cases, however, such as allegations of ill treatment of others, suspension from work may have to be considered immediately. Protection of others is paramount in all cases.

Within 10 working days of a concern being raised, the person investigating your disclosure will write to you:

- Acknowledging that the concern has been received
- Indicating how the Company proposes to deal with the matter
- Explaining what advice and support is available to you; and
- Telling you whether further investigations will take place and, if not, why not

### **Your legal rights**

This Policy has been written to take account of laws that protect employees making disclosures.

These laws make it unlawful for the Company to dismiss anyone or allow them to be victimized because of making an appropriate lawful disclosure.

### **Confidentiality**

All concerns will be treated in confidence and every effort will be made to not reveal your identity if that is what you wish. If an employee who is involved in the reporting or investigation fails to keep the confidentiality of a whistleblower, their employment may be terminated.

If disciplinary or other 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. An employee who retaliates against a whistleblower will be subject to disciplinary action including potential immediate termination of employment.

Employees are not allowed to contact external parties or media (including on social media) with respect to concerns, disclosures, or the whistleblowing process, and if such contact is made then you may be subject to disciplinary action.

### **Anonymous disclosures**

This Policy encourages you to put your name to your disclosure *wherever possible*. If you do not tell us who you are it will be much more difficult for us to protect your position or give you feedback.

Concerns made anonymously may be considered at the discretion of the Company, considering:

- The seriousness of the issue raised
- The credibility of the concern; and
- The likelihood of confirming the disclosure from other sources

### **Untrue disclosures**

If you make a disclosure in good faith and honestly and reasonably believe it to be true, but it is not confirmed by an investigation, the Company will recognize your concern and you have nothing to fear. If, however, you make an allegation frivolously, maliciously or for personal gain appropriate action (that could include disciplinary action) may be taken.

### **Compensation**

A successful whistleblower may receive compensation in the form of a cash award for providing a concern and information leading to the conviction of a criminal offence.

