

# GROUP WHISTLEBLOWING POLICY

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The Group is committed to the highest standards of quality, honesty and accountability.

Scope: This Policy applies to all employees, officers, consultants, representatives, agents and contractors Group companies (“person/persons”).

## OUR POLICY

This Policy encourages you to speak out and raise concerns in situations where the interests of the Group or the interests of others are put at risk and ordinarily should not be used for HR matters that would normally be handled via the Group’s grievance procedures.

The Group prohibits actions or behaviours posing a real or significant risk to the Group and its subsidiary companies, people working on behalf of the Group and the public at large.

Example of such actions and behaviours would include (but are not limited to):

- On-the-job drug or alcohol abuse;
- Harassment or discrimination;
- Theft or property damage;
- Poor workmanship or inappropriate “shortcuts”;
- Health, safety and environmental issues;
- Violations of the Group’s Code of Business Conduct, company policies or procedures;
- Any other violations of applicable laws and regulations
- Criminal offences or unlawful activity;
- Actions that might cause damage to the environment; and
- Actions with attempt to conceal any of the above.

All UK employees will be protected under the Public Interest Disclosure Act 1998, where they make a protected disclosure. These are disclosures of information, which in the reasonable belief of the person making the disclosure, demonstrate any of the following activities:

- A criminal offence has been, is being, or is likely to be, committed;
- That a person has failed, is failing or is likely to have failed to comply with any legal obligation to which they are subject;
- A miscarriage of justice has occurred, is occurring or is likely to occur;

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- That health and safety of an individual has been, is being or is likely to be endangered;
- That the environment has been, is being or is likely to be damaged; and
- That information relating to the above is being, or is likely to be deliberately concealed.

Persons in other territories will be treated by the Group as if such legislation applied to them.

The Group is, in addition to the above, required to ensure compliance with local laws in the places in which we may be working or operating.

## NO RETALIATION

This Policy encourages the reporting and raising of concerns in good faith. If you raise a genuine concern under this Policy you will not be at risk of losing your job or suffering any form of reprisals or victimisation as a result of raising that concern.

The Group prohibits any retaliation, retribution or victimisation in any form against an individual who reports a concern in good faith or who assists with an investigation – even if the report is mistaken and/or the facts later turn out to be inaccurate or do not trigger any further action.

We will take disciplinary action against employees who are found to have acted in violation of this Policy and other Group Policies. This may lead to dismissal or termination of employment or engagement and/or, if appropriate, criminal proceedings.

We will terminate business relationships with any consultant, contractor, agent or representative that violates any provision of this Policy.

## HOW TO RAISE A CONCERN

We hope that, in the first instance, you will feel able to report or raise a concern with your direct Line Manager. You can do this in-person, in writing or by telephone.

We understand that there may be situations where you might feel unable to report or raise a concern with your Line Manager. You may be worried as to how reporting a concern may impact you (or others) or your concern itself may involve alleged behaviours or actions by one of these people.

In such instances you can make a report, in confidence, to your Managing Director or other Director, as appropriate.

If these channels have been exhausted and you still have concerns, or if you feel that the matter is so serious that it cannot be discussed with any of the above, you should contact the Group's Chief Executive Officer.

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## HOW CONCERNS WILL BE INVESTIGATED

Once you have told us of your concern, we will look into it carefully to assess what action, if any, should be taken. We are committed to dealing with all concerns fairly, properly and in a professional manner.

We will treat your concern with the utmost importance, care and priority. However, we expect that you will use this Whistleblowing Policy and investigative process properly and it will not be used for unethical, unjust or immoral purposes or for trivial concerns.

The action taken by the Group in response to a report or concern under this Policy will depend on the nature of the concern. Initial enquiries will be made to determine whether an investigation is appropriate and the form that it should take. concerns may be resolved without the need for investigation.

Depending on the nature of the concern raised there may be an internal inquiry or more formal investigation.

The amount of contact between the complainant and the person or persons investigating the concern will depend on the nature of the issue and the clarity of information provided. Further information may be sought from or provided to the person reporting the concern.

We will tell you who your point of contact will be, how you can make contact with that person and whether we will need further assistance from you. We may ask you how you think your concern should be best dealt with.

If you have a personal interest in the matter, we would ask that you tell us at the outset. Whilst we will try to give you as much feedback as possible, we may not be able to give you full or specific details as this could infringe upon a duty of confidentiality owed by us to someone else.

### Dealing with anonymous reports

We can deal with your concern even if you prefer to remain anonymous but it may make it harder to investigate the matter and we will not be able to give you any feedback. This Policy encourages employees to put their names to allegations because appropriate follow-up questions and investigation may not be possible unless the source of the information is identified. Where concerns cannot be resolved without revealing the identity of the employee raising the concern (e.g. if evidence is required in court), we will enter into a dialogue with the employee concerned as to whether and how we can proceed. Concerns expressed anonymously will be explored appropriately, but consideration will be given to the seriousness of the issue raised, the credibility of the concern and the likelihood of confirming the allegation from attributable sources.

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We will keep records of the matters raised in relation to this Policy. All such records will be held in confidence to the extent consistent with carrying out appropriate investigation under applicable laws.

## CONFIDENTIAL RECORDS

The Board of Directors will receive reports containing an assessment of the effectiveness of this Policy in dealing with matters raised. The Board of Directors may, where appropriate and permitted, also receive reports or details of individual matters raised.

## FURTHER INFORMATION

Sometimes you know what the right thing to do is but sometimes there is an element of doubt. If you are unsure then ask and remind yourself:

- Does it comply with a Group Policy – for example the Group Code of Business Conduct?
- Would I be embarrassed if anyone within or outside of the Company knew about the situation or my actions?

This Policy has been adopted by the Group and should be read in conjunction with the whistleblowing policy of the relevant Group company.