

Whistleblowing Policy

Last Reviewed: June 2026

Purpose

The purpose of this policy is to set out our approach to whistleblowing. It applies to all workers, including employees, directors, agents, consultants, contractors and any other people or bodies associated with the Company across all areas and functions.

We are committed to maintaining high standards of integrity and openness. It is important that any criminal behaviour, wrongdoing or malpractice is reported and properly dealt with.

This policy is underpinned by the Public Interest Disclosure Act 1998, which provides legal protection for workers who raise certain concerns in the public interest. Any confidentiality or so-called 'gagging' clause in a settlement agreement does not prevent a worker from making a protected disclosure.

We are committed to ensuring that no worker suffers any detriment, victimisation or retaliation as a result of raising a concern in good faith. This policy is not intended to question properly made business or financial decisions, nor should it be used to reconsider matters already addressed under other procedures such as grievance, harassment or disciplinary processes.

Scope of Policy

This policy covers concerns that are in the public interest and which may initially be investigated separately but could lead to other procedures. Examples include:

- Financial malpractice, impropriety or fraud
- Failure to comply with a legal obligation or statutory requirement
- Dangers to health and safety or the environment
- Criminal activity
- Improper conduct or unethical behaviour
- Attempts to conceal any of the above

This policy will be reviewed annually, or sooner where required, to ensure it remains compliant with legislation and reflects current organisational practices.

Confidentiality

This policy is designed to offer protection to workers who raise concerns provided the disclosure is made:

- in good faith; and
- in the reasonable belief that the information tends to show wrongdoing; and
- to an appropriate person in line with this policy.

Disclosures will be treated confidentially and sensitively and handled in accordance with applicable data protection legislation. A worker's identity will be kept confidential wherever possible, provided this does not hinder or frustrate the investigation. However, the investigation process may reveal the source of the information, and the worker may be required to provide a statement.

Workers are encouraged to put their name to any disclosure. Anonymous disclosures will be considered at the Company's discretion, taking into account:

- the seriousness of the issue raised;
- the credibility of the concern; and
- the likelihood of confirming the allegation from reliable sources.

If a concern is raised in good faith but is not substantiated by an investigation, no action will be taken against the worker. However, malicious, vexatious or knowingly false allegations may result in disciplinary action.

Procedure

Workers are encouraged to raise concerns at the earliest opportunity. Where possible, concerns should be raised verbally or in writing with their line manager, including any relevant evidence or documents.

If the worker believes their line manager may be involved, or they do not feel able to raise the concern with them, the matter should be reported in writing to the Company Secretary.

The Company will acknowledge the concern within a reasonable period and will ensure that it is assessed objectively. This may involve:

- an initial review to determine whether an investigation is appropriate;
- a full investigation with the assistance of appropriate colleagues;
- interviews with affected workers, who may be accompanied by a work colleague or trade union representative; and
- a report on the outcome, where appropriate, to the person who raised the concern.

The level of contact during an investigation will depend on the nature of the issue and the information provided. Workers will be kept informed of progress as appropriate, and the Company will take reasonable steps to address any substantiated concerns.

External Disclosures

Workers are encouraged to exhaust internal procedures before raising concerns externally. Where a disclosure is made to an external body, legal protection will generally only apply if it is made to a prescribed regulator and in accordance with the requirements of the Public Interest Disclosure Act 1998.