

The purpose of this whistleblower procedure is to establish a clear and confidential process for stakeholders to report any instances or suspicions of corruption, bribery, or information security concerns within the organisation. By providing a safe and protected avenue for reporting, we aim to encourage stakeholders to come forward with valuable information that can help maintain the integrity and security of our operations.

Scope:

This procedure applies to all stakeholders, including employees, contractors, customers, suppliers, and any other individuals associated with the organisation who wish to report corruption, bribery, or information security concerns.

Confidentiality and Anonymity:

Every effort will be made to protect the confidentiality and anonymity of the reporting stakeholder, subject to applicable laws and regulations. To ensure this:

- a. The organisation will not attempt to identify anonymous reporters unless explicitly required by law or authorised by the reporting individual.
- b. Confidentiality of the reporting stakeholder will be fully maintained possible throughout the investigation process.
- c. Only authorised personnel directly involved in investigating the reported concern will have access to the information provided by the whistleblower.

Reporting Procedure:

- a. Clearly identify the nature of the concern:** When reporting, stakeholders should provide specific details about the alleged corruption, bribery, or information security concern, including relevant dates, locations, individuals involved (if known), and any supporting evidence available.
- b. Provide contact details (optional):** While anonymous reporting is encouraged, stakeholders have the option to provide their contact information, allowing for follow-up communication if necessary. Providing contact details is not mandatory.
- c. Retaliation Protection:** The organisation prohibits any form of retaliation against individuals who report concerns in good faith. If any stakeholder experiences retaliation because of their report, they should report it immediately through the same channels provided in this procedure.

Reporting Handling and Investigation:

Upon receiving a whistleblower report, the organisation will follow these steps:

- a. Initial assessment:** The designated internal department responsible for handling whistleblower cases will review the report to determine its credibility and the appropriate course of action.
- b. Investigation:** If the concern is deemed credible, an investigation will be initiated. The investigation team will consist of individuals with the necessary expertise and independence to conduct a fair and unbiased inquiry.
- c. Regular updates:** The reporting stakeholder (if contact details were provided) will be periodically informed about the progress of the investigation, within the constraints of maintaining confidentiality and protecting the integrity of the process.
- d. Conclusion and actions:** Following the investigation, appropriate actions will be taken based on the findings. This may include disciplinary measures, legal actions, process improvements, or other remedial measures to address the reported concern.

Reporting Feedback:

Upon conclusion of the investigation, the reporting stakeholder (if contact details were provided) may receive a summary of the outcome, while respecting the privacy rights of all parties involved.

Communication and Awareness:

The organisation will regularly communicate and raise awareness about the whistleblower procedure, ensuring stakeholders are informed of their rights, protections, and the available reporting channels. This may include training sessions, intranet updates, posters, and other communication materials.

Retention of Records:

All records related to whistleblower reports, investigations, and subsequent actions will be securely retained in compliance with applicable laws and regulations.

External Reporting:

If stakeholders believe that the internal whistleblower procedure has not been adequately followed or addressed, they have the right to escalate their concerns to relevant external authorities or regulatory bodies, as appropriate.

Remember, reporting corruption, bribery, and information security concerns plays a vital role in maintaining the integrity and security of our organisation. We are committed to protecting those who come forward and ensuring that all reports are handled efficiently and fairly.

X



Robert James
Managing Director

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Richard James
Managing Director