

## Whistleblowing Policy

### Introduction

Whistleblowing is one of the most effective ways of preventing and eliminating wrongdoing at work.

We recognise that raising a whistleblowing concern can be daunting. However, we encourage you to report concerns internally as soon as possible where you suspect wrongdoing. We are here to listen and will take all concerns that you raise seriously.

This policy sets out the procedure for raising a whistleblowing concern and the support and protection that is available to you when you do so.

If your concern relates to a personal grievance that is not in the public interest (for example, an allegation of bullying or harassment, or an allegation that your contract of employment has been breached), you should raise it under our separate grievance procedure.

If you are unsure about whether your concerns are best dealt with under the whistleblowing policy or grievance procedure, please speak to the HR department for further advice.

This policy does not form part of your contract of employment and we reserve the right to amend or withdraw it at any time.

### Scope

This policy applies to all employees and workers employed by us. Other individuals, including our contractors, subcontractors, suppliers and volunteers are also encouraged to follow the procedure set out in this policy.

### Whistleblowing concerns to which this policy relates

Whistleblowing is the act of reporting suspected wrongdoing or risk of wrongdoing relating to:

- a criminal offence;
- a failure to comply with a legal obligation;
- a miscarriage of justice;
- a risk to the health and safety of an individual;
- damage to the environment; or
- an attempt to cover up any of the above.

It is not necessary for you to prove the wrongdoing. However, to be protected by whistleblowing laws against detrimental treatment or dismissal, you must

reasonably believe that wrongdoing (related to one of the categories listed above) is being, has been, or is likely to be committed and that your disclosure is in the public interest.

### **Stage 1 - Raising a whistleblowing concern**

If you have a genuine concern relating to any type of wrongdoing that is covered under this policy, you should raise your concern the HR department.

You can raise your concern orally, or in writing. We recommend that you use Hi bob (Your Voice) to raise a whistleblowing concern. In the event of Your Voice not being available you can submit your concern via an HR Request Form on Hi bob.

It is important that you set out clearly:

- the details of the suspected wrongdoing;
- the names of any individuals involved; and
- and what action (if any) you are seeking.

In some cases, it may be necessary to ask you to attend a meeting to clarify the nature of your concern. This will be arranged as soon as possible.

### **Stage 2 - Responding to your whistleblowing concern**

HR will decide if an investigation is required and, if it is, the most appropriate person to conduct it. The relevant individual will write to you confirming that they are conducting an investigation and the timescale for completion.

The level of investigation and time this will take will vary depending on the nature of the suspected wrongdoing.

Following the investigation, the relevant individual will inform you in writing, as quickly as possible after completion of the investigation, of the outcome and any next steps or action that will be taken. While we aim to provide you with comprehensive feedback, in some cases this may not be possible, for example where data protection rules apply or there are sensitive issues that need to remain confidential.

### **Stage 3 - Appeal**

If you are not satisfied with how your concern has been dealt with, you should appeal to the Global Deputy Managing Director & Head of Organisational Health.

You can raise your appeal orally, or in writing. It is important that you set out clearly the grounds of your appeal, ie the basis on which you consider that your original concern has not been satisfactorily dealt with.

In some cases, it may be necessary to ask you to attend a meeting to clarify the nature of your appeal. This will be arranged as soon as possible.

The relevant individual will consider your grounds for appeal and review the manner in which your original whistleblowing concern was handled. You will be informed in writing of the outcome as quickly as possible.

### **Confidentiality**

We want you to feel comfortable about raising a whistleblowing concern openly and actively encourage you to do so.

Where you raise a whistleblowing concern openly, we will maintain your confidentiality as far as possible. If we need to identify your identity to anyone, we will notify you beforehand.

### **Our commitment to you**

You have the right not to be subjected to any detrimental treatment (including being unfairly penalised, disciplined or dismissed) because you have raised a whistleblowing concern.

If you raise a whistleblowing concern in accordance with this policy, we will ensure that you are treated with respect and provided with adequate support and protection.

If you are told not to raise or pursue a whistleblowing concern, or you believe that you have been subjected to detrimental treatment because you have raised a whistleblowing concern, you should report the matter to the Global Head of HR. In the alternative, you can raise it under our Grievance procedure if it applies to you.

Any such behaviour will not be tolerated and will be treated as a disciplinary offence.

If we find that an individual has knowingly raised false allegations, this will also be treated as a disciplinary offence.

### **Policy Review**

The policy will be reviewed and updated by the HR to reflect any changes in employment law. If any update is required, the updated document will be reviewed and approved by the Global Head of HR, prior to publication.

### Policy Document Version Control

<b>Date</b>	<b>Version</b>	<b>Author</b>	<b>Key Changes</b>	<b>Authorised</b>
January 2024	V1	HR Generalist	New Policy	Global Head of HR