

## Whistle Blowing Procedure

1.1 If you believe that any breach of the Group / Company's rules or other malpractice, including any acts of Modern Slavery or Human Trafficking may have taken place, or is likely to occur in the future, you are encouraged to report your suspicions to your Line Manager so that the matter may be investigated and appropriate action taken. If you feel unable to report the matter to your Line Manager, you should speak to the next most senior level of management or your local HR Advisor.

1.2 You can report your suspicions verbally or in writing and you should try to provide as much information as possible in support of your suspicions.

1.3 The Manager to whom you report your suspicions will arrange to have a meeting with you to discuss your suspicions in detail. This is to enable the Manager to consider how best to proceed. A colleague of your choice may attend if you so wish.

1.4 If the matter requires further investigation such an investigation will be carried out and you will be informed of the outcome of the investigations and what, if any, action has been taken.

1.5 At all times during and after the investigation, your identity will be kept confidential, unless you agree otherwise in order to further any investigation. However, the Group recognises that there may be matters that cannot be dealt with internally and external authorities will need to become involved. Where this is necessary the Group reserves the right to make such a referral without your consent.

1.6 The Group undertakes that no employee who makes a genuine report under this procedure will be subjected to any detriment as a result. In the event that you believe that you are being subjected to a detriment by any person within the Group as a result of your decision to invoke the procedure you must inform your Line Manager immediately and appropriate action will be taken to protect you from reprisals.

1.7 If it should become clear that the procedure has not been invoked in good faith, for example for malicious reasons or to pursue a personal grudge against another employee or the Group, this will constitute an act of misconduct and in some circumstances, depending on the severity of the situation, gross misconduct, and will be dealt with in accordance with the Group's Disciplinary Procedure.