

# Whistleblowing Policy

We are committed to creating and maintaining a culture in which everyone feels able and encouraged to speak out when something is not right. Speaking up is an important part of our commitment to integrity, professionalism and ethical behaviour in all aspects of our business.

Whistleblowing is the reporting of information in the public interest that the individual reasonably believes shows one or more of the following:

- A criminal offence (for example fraud, bribery or corruption)
- A breach of a legal obligation
- A miscarriage of justice
- A danger to health and safety
- Damage to the environment
- Bullying, harassment or discrimination
- A deliberate attempt to conceal any of the above

This Policy applies to all employees, directors, contractors and others working on our behalf who can raise concerns about suspected wrongdoing, unethical behaviour, breaches of law, or conduct that conflicts with our values.

The policy reflects our obligations under the Public Interest Disclosure Act 1998 (PIDA) and reinforces the company's commitment that: anyone who raises a concern in good faith will be treated fairly and protected from retaliation, even where the concern is not ultimately substantiated.

This Policy is not intended to replace the Company's established grievance procedures relating to personal employment matters such as pay, performance management, or interpersonal disputes, unless there is a wider public interest concern.

Concerns may be raised in confidence with a Director or the appointed Business Ethics Representative. All concerns will be handled fairly, appropriately, and without victimisation.

Matters raised will normally be subject to an initial informal review by a Director or the Business Ethics Representative. Where concerns relate to issues of a more serious nature, or where the matter cannot be resolved informally, a more formal investigation may be undertaken.

No individual will be victimised for raising a concern, making a complaint, or supporting another individual in doing so. Any form of retaliation will be regarded as a serious breach of discipline and may result in formal investigation and disciplinary action.

This policy will be reviewed periodically and updated where necessary to ensure it remains effective and compliant with relevant legislation.

Signed

Andrew P Hodgkinson

Director

Date: 18 May 2026