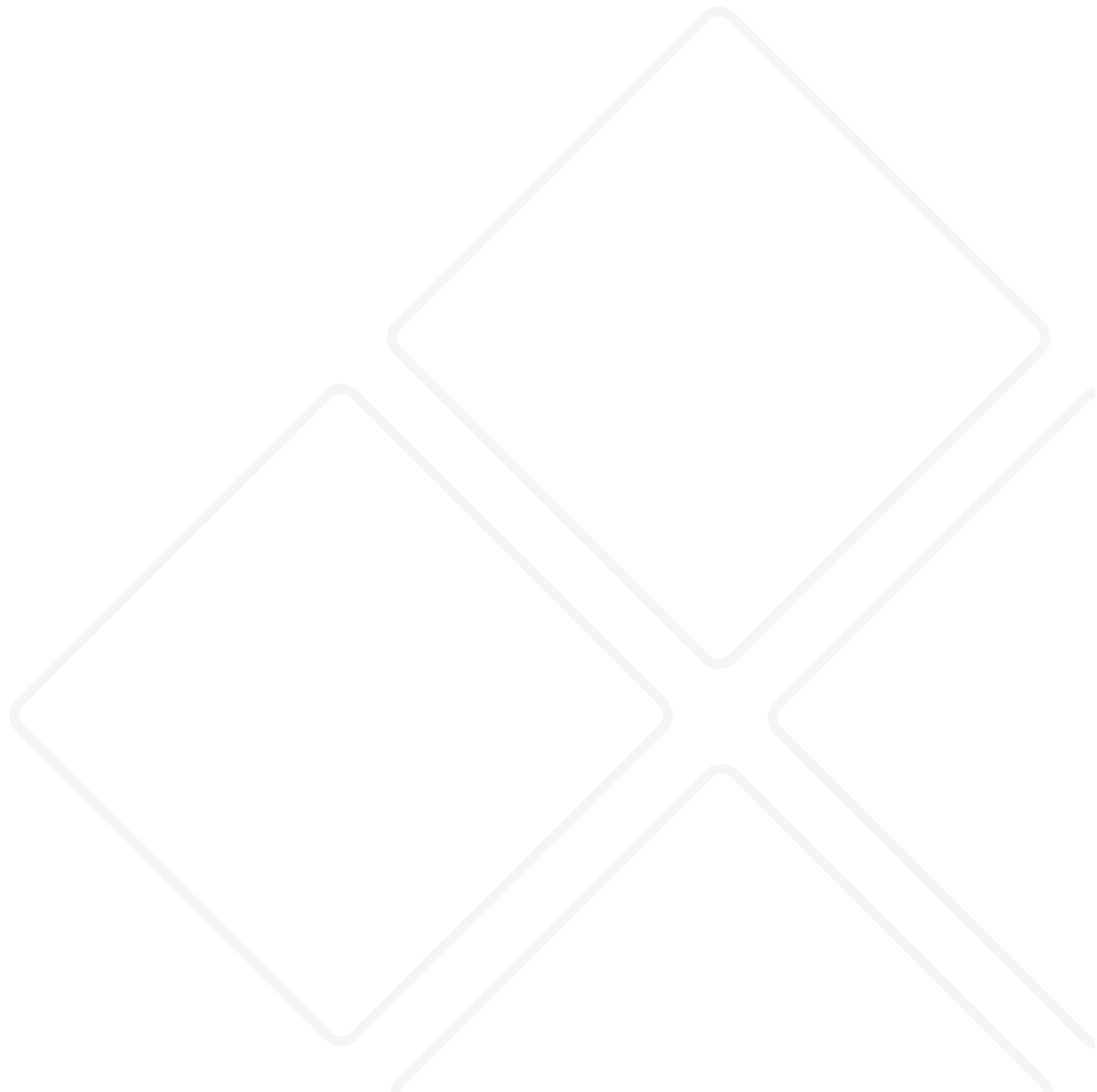




Whistleblowing Policy

Tuesday, 14 May 2024





Whistleblowing Policy

Aims of this policy

Everyone should be aware of the importance of preventing and eliminating wrongdoing at work.

This Whistle blowing Policy is underpinned by the Public Interest Disclosure Act 1998 (known as the Whistleblowers Act). This gives legal protection to employees against being dismissed or penalised by their employers as a result of publicly disclosing certain serious concerns. The Group is committed to ensuring that no employee should feel at a disadvantage in raising legitimate concerns.

Scope of the policy

This policy is intended to cover concerns that an employee may have. These concerns may initially be investigated, which may then lead to other procedures being invoked, e.g. disciplinary. The concerns raised could include:

- financial malpractice or impropriety or fraud;
- theft;
- failure to comply with a legal obligation or statutes;
- an act creating risk to health and safety;
- criminal activity;
- improper conduct or unethical behaviour; or attempts to conceal any of these.

Confidentiality

The Group will treat all such disclosures in a confidential and sensitive manner. The identity of the employee making the allegation will be kept confidential so long as it does not hinder or frustrate any investigation. However, the investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence required.

Procedure

If an employee has a concern, they should first raise it with their line manager; verbally or in writing. The line manager should then report the disclosure to the relevant HR manager for their business. If the employee thinks that the line manager may be involved or they do not feel comfortable in approaching them then the following options for reporting are available:

- verbally, or in writing, raise the issue with the HR manager or HR advisor that supports their business;
- use the internal 0800 012 1640 helpline number and leave a message detailing the concern they have. The employee should also leave their contact details (if they are happy) to be contacted with regards to the concern they are raising as this can help with the investigation;
- use the following internal e-mail address to notify the company of an issue tellus@vpplc.com; again it is helpful to provide your contact details; or
- use the external, free and confidential advice service **'Protect'** on **0203 117 2520**



Whichever route an employee chooses to notify the company or Protect of the concern/issue, as much detail as possible concerning the alleged actions should be given.

Approved by the Board March 2023 If an employee believes a senior manager/director of the business may be involved in wrongdoing of any type, the employee should raise the matter with the Group HR Director.

The company will ensure that an investigation takes place and will make an objective assessment of the concern or issue. The employee, if they have identified themselves, will be advised of progress and the company will ensure the necessary action is taken to resolve the concern/issue.

If the concern raised is deemed to be a grievance, the matter will be passed to the relevant manager who will then follow the grievance procedure supported by HR.

Monitoring and review of the policy

The policy will be reviewed annually to ensure its effectiveness