

Whistleblowing Policy			
Ref:	CSR/POL/004	Version:	B Rev 00
Author:	S. Howes	Approved:	Executive Board
Issue Date:	06/01/2025	Review Date:	03/01/2027

## | Introduction

Olympus Global is committed to the highest standards of honesty, openness and accountability. We aim to create a transparent and safe working environment where workers feel able to speak up and report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate.

All organisations face the risk of things going wrong or unknowingly harbouring malpractice, but we as a business recognise our duty to identify and take measures to remedy all matters of malpractice.

It is often members of the workforce who are the first to know if someone in the organisation, or connected with it, appears to be acting illegally or improperly. They may feel apprehensive or anxious about raising concerns, worried that they may not be taken seriously or troubled about any action against themselves that a disclosure might provoke.

The aim of this policy is to encourage employees and others who have serious concerns to confidently voice the same and to provide suitable guidance as to how to raise such matters. Its further aim is to provide reassurance that any individual can raise genuine concerns without fear of reprisals, even if the matter turns out to be a mistake but the disclosure has been raised in good faith.

## | Definitions

Whistleblowing – a person who exposes or reports any kind of information or activity that is deemed illegal, unethical, or not correct within an organisation that is either public such as the NHS or a local council or a privately owned business.

Malpractice – improper, illegal or negligent professional behaviour.

Fraud – as defined in this policy refers to a situation where an individual(s) has undertaken, or intends to undertake, actions to obtain gain for him/herself or another, cause loss to another, or expose another to risk or loss.

Corruption – refers to an individual(s) who has given or obtained an advantage through means which are illegal, immoral and or inconsistent with their duties in their role within the company. Examples of this can be accepting bribes or incentives during procurement processes or seeking to influence others.

Disclosure – making new or secret information or a fact known.

Impropriety – failure to observe standards of honesty or modesty, improper behaviour or character.

In good faith – honesty, openness and sincerity.

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Whistleblowing is the term used when an employee, employees or certain other persons pass on information or report suspected matters of wrongdoing, malpractice, misconduct, illegal acts or failure to act within their workplace. It can also be referred to as making a disclosure.

Employees are often the first to realise that there may be something seriously wrong within their workplace. Whistleblowing is to be viewed as a positive act that can make a valuable contribution to the organisation's success and long-term efficiency, and it is not disloyal to colleagues or the company to speak up.

The Public Interests Disclosure Act 1998 gives legal protection to employees against being dismissed or penalised by their employers as a result of publicly disclosing certain serious concerns.

It is fundamental to any employment contract that an employee will be loyal to his or her employer and will not disclose confidential information outside the organisation.

This policy is designed to ensure employees can raise their concerns about wrongdoing or malpractice etc within the organisation without fear of victimisation, subsequent discrimination, disadvantage or dismissal.

It is also intended to encourage and enable employees to raise serious concerns within the organisation rather than ignoring a problem or 'blowing the whistle' outside the company.

#### | Purpose

This Policy is intended to enable those who become aware of wrongdoing within the company to report their concerns at the earliest opportunity then allowing the company to carry out a proper and full investigation.

This policy is not intended to replace existing procedures for example:

- If you are concerned about your own treatment as an employee, you should raise it under the existing grievance or harassment procedures.
- If a client is concerned about services provided it should be raised as a complaint.
- Complaints of general misconduct by an employee are usually dealt with under the discipline procedure.

The Public Interest Disclosure Act limits its protection to employees, agency workers and self-employed workers, however this policy and procedure shall, if and where necessary, extend to ensure similar protection to any legitimate outside concern raised by for example a supplier or customer.

#### | Scope

Who can raise a concern under this Policy?

- an employee of Olympus Global

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- an Agency worker
- self-employed person working under agreement or contract for Olympus Global
- employees of contractors working for Olympus Global
- employees of suppliers
- employees of a customer if they have concerns for example over malpractice

What should be reported?

Any serious concerns you may have about service provision or the conduct of any other employees or others acting or working on behalf of Olympus Global that:

- make you feel uncomfortable.
- are not in keeping with the company’s normal ethical practices or company policy.
- are behaving improperly, or
- are working or allow their work to fall below established standards and practice.

These might include the following:

- financial malpractice or impropriety or fraud.
- any other fraud, attempted bribery or corruption, abuse of position.
- unauthorised use of company funds.
- conduct which is an offence or a breach of the law (criminal offence has been committed or planned, or failing to comply with any other legal obligation).
- dangers to health and safety or the environment.
- improper conduct or unethical behaviour including any offence under the Bribery Act 2010.
- miscarriage of justice.
- deliberate act to conceal any of the above.

This list is not exhaustive.

## | Whistleblowing Procedure

### | Who should you raise your concern with?

This will depend on the seriousness and sensitivity of the issues involved and who is suspected of the wrongdoing. Ideally employees should normally raise their concern(s) with their immediate senior manager or the person responsible for Human Resources Management.

If the concern involves the people above or you feel you cannot tell either of these people for whatever reason, you should raise the issue with a director.

Suppliers, Clients, Contractors working on behalf of the Company or any other workers should raise their concern(s) with the Operations Director or the person responsible for Human

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Resources Management. If this is not appropriate for any reason the concern should be referred to a Managing Director.

At whatever level the issue is raised any personal interest in the issue should be declared at the onset.

### | How to raise a concern

Concerns may be raised in person, by telephone or in writing. The earlier you express your concern the easier it is to take action.

The following information will be required:

- the nature of your concern and why it is believed to be true
- the background and history of the concern (giving relevant dates)

Although you are not expected to prove beyond doubt the truth of your suspicion, you will need to demonstrate that you have a genuine concern relating to suspected wrongdoing or malpractice within the Company and there are reasonable grounds for your concern.

Your trade union, professional association representative or a friend may be present for support during any meetings or interviews in connection with the concerns raised.

### | How Olympus Global will respond to your concern

After you have raised your concern, the Company will decide how best to respond in a responsible and appropriate manner.

In order to be fair to all employees, including those who may be wrongly or mistakenly accused, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take.

The investigation may need to be carried out under terms of strict confidentiality, i.e. by not informing the subject of the complaint until, or if it becomes necessary to do so. In certain cases, however, such as allegations of ill treatment of others, suspension from work may have to be considered immediately. Protection of others is paramount in all cases.

Where appropriate, the matters raised may be:

- investigated by management, internal audit, or through the disciplinary/grievance process
- referred to the police
- referred to an external auditor in the case of financial concerns

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Within ten working days of a concern being raised, the person investigating your concern will write to you:

- acknowledging that the concern has been received
- indicating how the Company proposes to deal with the matter
- advising you of the support structure
- telling you whether further investigations will take place and if not, why not.

The level of contact between you and the Managers considering the issues will depend on the nature of the concern(s) raised, the potential difficulties involved, and the clarity of information supplied. It is likely that you will be interviewed to ensure that your disclosure is fully understood.

Any meeting can be arranged away from your workplace, if you wish, and a union, professional association representative or a friend may accompany you in support.

The Company will do what it can to minimise any difficulties that you may experience as a result of raising a concern, for example if you are asked to give evidence in criminal or disciplinary proceedings, arrangements will be made for you to receive appropriate advice and support.

You will be kept informed of the progress and outcome of any investigation unless there are legal reasons as to why this is not suitable or matters that would infringe our duty of confidentiality to others.

#### | No feedback from a matter raised

If a number of weeks have gone by since you raised a concern to the applicable person, then you should do either of the following:

- If you are confident to do so, address the same person again asking how the investigation is progressing.
- Ask to speak to your manager's manager or a director.
- Put your concern in writing to a director stating that you have already raised the matter verbally.

#### | How the matter can be taken further

The purpose of this policy is to provide an avenue within the Company to raise concerns. It is hoped you will be satisfied with any action taken. If you are not, and you feel it is right to take the matter outside the Company, the following are the Company's prescribed contacts:

- Financial auditor –
- Your trade Union if you are a member
- The Police

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- Health & Safety Executive
- Other relevant bodies prescribed by legislation e.g. The Environmental Agency
- Public Concern at Work - Tel: 0207 404 6609

If you raise concerns outside the Company, you should ensure that it is to one of these prescribed contacts. A public disclosure to anyone else could take you outside the protection of the Public Interest Disclosure Act and of this Policy as stated below in the Protection Section.

If you take this route without first reporting it to the Company, you may be required to demonstrate why you thought the normal internal procedure was not appropriate.

You should not disclose Company information that is confidential or confidential information that you may become aware of that relates to any others involved with the Company for example suppliers or customers, other than to those included in the list of prescribed contacts above.

This Policy does not prevent you from taking your own legal advice.

#### | Protection

#### | Legal Rights

The Public Interest Disclosure Act 1998 protects workers making disclosures about certain matters of concern, when those disclosures are made.

- in good faith.
- in the reasonable belief that the disclosure may help identify malpractice.
- in accordance with the Act's provisions and in the public interest.
- by following the correct disclosure procedure including reporting to the appropriate person.
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If a concern is raised outside of the company, without first using this procedure, the individual may be in breach of the procedure which is potentially a disciplinary matter, especially if it results, or may have resulted in unnecessary reputational damage to a colleague or to the company. This may also be interpreted as the individual having waived their rights under the Public Interest Disclosure Act. It is inappropriate for matters to be raised publicly in the media before an investigation can be completed.

It is unlawful for the company to dismiss anyone or allow them to be victimised, suffer detrimental treatment or allow them to be placed at a disadvantage on the basis that they have made an appropriate lawful disclosure in accordance with the Act.

Although unlikely, an incident may arise where it is the employee or an employee who has participated in the concern that comes forward to raise the matter. In such cases the company

cannot promise not to take action against the employee, but the fact they have come forward may be taken into consideration.

### | Confidentiality

The company recognises the need to treat all disclosures and information regarding any action taken under this policy and procedure in a confidential and sensitive manner so far as is reasonably practicable, however it is not possible to guarantee confidentiality.

If the company finds that it is not able to maintain confidentiality the person raising the concern will be notified prior to any disclosure made by the Company.

### | Individual raising the concern

The identity of the individual raising the concern will remain confidential, unless otherwise agreed with that individual, so far as it does not hinder or frustrate the investigation, however it may not be possible to act as a result of an individual's disclosure without their assistance. For example, the individual may be asked to come forward as a witness. If the individual agrees to this advice and support will be offered.

### | Named Individual

During the course of any investigation the company will endeavour to maintain confidentiality in relation to the names of any person(s) named in the allegation.

### | Harassment or Victimisation

The decision to report a concern can be very difficult one to make and the entire situation can bring forth other issues arising from the confidentiality with which the matter may need to be dealt with. This can then result in harassment and victimisation for the employee who made the disclosure.

Olympus Global will not tolerate any harassment or victimisation of a whistleblower and will take appropriate action to protect

### | Support

Throughout this process:

- you will be given full support from senior management
- your concerns will be taken seriously, and
- the company will do all it can to help you throughout the investigation

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For those who are not our employees, we will endeavour to provide appropriate advice and support wherever possible.

#### | Anonymous Allegations

This Policy encourages you to put your name to your allegation whenever possible. If you do not tell us who you are it will be much more difficult for us to protect your position or to give you feedback. This policy is not ideally suited to concerns raised anonymously.

Concerns expressed anonymously are much less powerful, but they may be considered at the discretion of the Company. In exercising this discretion, the factors to be taken into account would include:

- the seriousness of the issue raised
- the credibility of the concern, and
- the likelihood of confirming the allegation from other sources

#### | Untrue Allegations

No action will be taken against an individual who makes an allegation in good faith even if following investigation it is not confirmed, however if an individual deliberately makes accusations about other employees or workers that they know to be untrue, malicious or vexatious or allegations made for personal gain, disciplinary action may be taken.

#### | Training and Awareness

All employees shall be made aware of the contents of this policy at induction and provided with a copy which shall be as an Appendix to the Staff Handbook. Opportunity will be given to discuss the policy to ensure the employee fully understands its importance.

Training will be provided to all workers on how disclosures should be raised and how they will be acted upon.

Training will be provided to managers on how to deal with disclosures. The policy and procedure can be viewed by employees on the company intranet.

#### | Unsure as to what action to take

If you are unsure whether to use this Policy or feel that you may benefit from independent legal advice, you may find it helpful and beneficial to contact any of the following:

- Public Concern at Work – The Whistleblowing Charity which is an independent charity whose advisers can give free confidential advice. Tel: 0207 404 6609;
- any Union adviser of an applicable (if you are not already a member, they may require you to join);
- your local Citizens Advice Bureau.
- Advisory, Conciliation and Arbitration Service (ACAS) 0300 123 1100



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#### | Responsibilities

#### | Associated Policies & Documents

#### | Policy Review & Monitoring

This policy will be monitored for its effectiveness and a review will be undertaken as to its implementation as a minimum on a biennial basis. The review process will consider its suitability and whether it is sufficient for its purpose.

Information relating to Company policies, practices and procedures are related at the time of induction in the Employee Handbook. Further copies are available to employees and others via the Intranet HR/Policies.

Employees are invited to comment on this policy and to put forward any suggestions as to ways in which the policy may be improved. Comments, suggestions or queries should be addressed to Chris Round, Operations Director in the first instance.

This policy does not form part of the any employee's contract of employment, and it may be amended at any time. Changes to this policy will be notified by the placing of an updated version within the HR section, Policies on the company intranet.

#### | Document Control

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Password Protected:	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Intranet Access:	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

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## | Annex 1 Whistleblowing Procedure and Hotline

### 1 | Purpose

This procedure provides a mechanism for employees, contractors, and stakeholders to report concerns related to unethical, illegal, or unsafe activities within the company, without fear of retaliation.

### 2 | Scope

Applies to all employees, contractors, suppliers, and third-party partners of Olympus Global UK.

### 3 | What Can Be Reported

- Whistleblowing concerns may include, but are not limited to:
- Fraud, corruption, or financial misconduct
- Breaches of legal or regulatory obligations
- Health and safety risks
- Discrimination, harassment, or abuse
- Environmental damage
- Human rights or labour violations in the supply chain

### 4. Reporting Channels


#### | Internal Reporting


Reports can be made to:


- Line Manager or Supervisor
- Human Resources Department
- QHSE & Compliance Officer
- Company Director


#### | Confidential Whistleblowing Hotline

A dedicated and confidential hotline is available for reporting anonymously:

 Whistleblower Hotline: 07596 294128

 Email: [support@olympusglobal.co.uk](mailto:support@olympusglobal.co.uk)

 Online Reporting Form: [OG Whistleblowing Online Report Form](#)

 Availability: 24/7, confidential and, if preferred, anonymous

### 5 | Protection for Whistleblowers

- No retaliation: Whistleblowers will be protected from dismissal, harassment, or any form of retaliation.
- Anonymity: Reports can be made anonymously, and identities will be protected where disclosure is not legally required.

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- Fair investigation: All concerns will be taken seriously and investigated appropriately.

## 6 | Investigation Process

- Acknowledge receipt of the report within [5] working days.
- Conduct a preliminary assessment.
- Initiate a formal investigation, if warranted.
- Communicate outcomes where appropriate and permissible.

## 7. Follow-Up

The company commits to:

- Taking corrective actions where necessary
- Improving systems and policies to prevent recurrence
- Regularly reviewing whistleblowing data and trends as part of Sustainability and ESG Governance.