

Speak Up Policy

Version 1.0

AdvT Group Policy

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We are committed to high standards of corporate behaviour towards our people, customers, consumers, governments and the communities in which we operate. Openness is a core Value.

This policy sets out our commitments to speaking up about concerns you have at work, also known as 'raising concerns' or 'whistleblowing' and the channels available to do so responsibly and effectively, whether it is about a potential violation of the law or of our Values, policies or anything which may be unethical.

This policy is to assist individuals concerned about malpractice or impropriety within, or involving, the AdvT Group or any of its companies. If you wish to raise a personal employment concern, our employee grievance procedure should be followed in the first instance.

We are committed to

- Acting in accordance with our legal, regulatory and professional obligations.
- Promoting an open and transparent culture across our businesses which encourages any person to speak up if they see or reasonably believe misconduct is occurring or is likely to occur.
- Operating a non-reprisal policy, where a person raises a concern in good faith, whether the concern is proven or not.
- Respecting the confidentiality of any person raising a concern. We will not divulge the personal information of anyone raising a concern unless we are required to do so by law or to meet our regulatory or professional obligations.

What you should expect from us

- We will protect any person who raises a concern from being at risk of losing their role or suffering reprisal as a result of raising a concern.
- We will not tolerate the harassment or victimisation of anyone raising a concern or any attempt to influence a person into not raising any such concern.
- Any such behaviour is a breach of our expected conduct and, if upheld, could result in disciplinary action against the perpetrator which may lead to dismissal.
- To keep any person who raises a concern under this policy informed of the steps we will take to review the matter and the outcomes of our review where we are permitted to do so.
- To inform you if we operate alternative or additional channels beyond those covered in this policy to raise concerns in the business area you work in. These may be in place to meet business and / or country specific legal, regulatory, or professional obligations.

What we expect from you

- To speak up if you have a concern under this policy. Do not wait for proof or assume someone else will report the concern. They may not! We want you to raise the matter while it is still a concern.
- To raise any concerns in accordance with this policy.

What we expect from our managers

- To listen to, acknowledge and support any person who raises a concern to you in accordance with

this policy and our manager commitments, directing concerns to our Business Integrity Team.

- To promote and help foster a workplace environment that supports any person to speak up in good faith without fear of reprisal.
- If someone raises a Speak Up concern with you, you should direct them to the web service or telephone number of our speak up provider.

What can be reported as a Speak Up?

- A criminal offence, failure to comply with a legal obligation or miscarriage of justice.
- Breaches of our policies, standards, procedures and guidance, including any applicable industry or professional code.
- Improper conduct or unethical behaviour or behaviours which are not in accordance with our Values.
- Dangers to health and safety or the environment.
- The deliberate concealment of information about any of the above.
- Retaliation against those raising concerns.

You should raise a concern under this policy by

- Informing your line manager either in person or by putting the matter in writing. Your line manager may be able to agree a way of resolving your concern quickly and effectively.
- Where the matter is more serious, or you feel that your line manager has not addressed your concern, or you prefer not to raise it with them for any reason, you should contact one of the following who can deal with your complaint accordingly;
 - HR Business partner
 - Group CFO

If you raise a concern

- Please provide as much information as possible. Remember, the more information provided the more likely your concern can be properly investigated.
- We hope that staff will feel able to voice whistleblowing concerns openly under this policy. Completely anonymous disclosures are difficult to investigate. Whilst it is possible to make disclosure anonymously, it is recommended that you provide your name but request confidentiality, as it enables more thorough investigation while still protecting your identity. If you want to raise your concern confidentially, we will make every effort to keep your identity secret and only reveal it where necessary to those involved in the investigation of your concern.

You should *not* use this policy to

- Report events presenting an immediate threat to life or property. Please follow your business emergency procedures.
- Report any grievances you may have in relation to your terms of employment. Please follow our employee grievance procedure relevant to where you work.
- Settle personal or legal disputes. Make accusations which you know are false. Doing so may lead to disciplinary measures.

Raising a concern to a prescribed person or body

- You may also be able to report your concern to a prescribed person or body rather than to us.
- You must make sure you choose the correct person or body for your issue.

Related links

- ACAS - <https://www.acas.org.uk/whistleblowing-at-work>
- Direct Gov - <https://www.gov.uk/whistleblowing>