

# BEYONDLY

G-6

## Whistleblowing

### Policy Statement

Beyondly is fully committed to compliance with all anti-bribery and anti-corruption legislation including, but not limited to, the Bribery Act 2010. In accordance with our Anti Bribery policy (G-5) the Company actively encourages a culture of honesty and openness and therefore all stakeholders including employees, partners and suppliers are encouraged to raise any issue that might constitute as malpractice with the appropriate individuals.

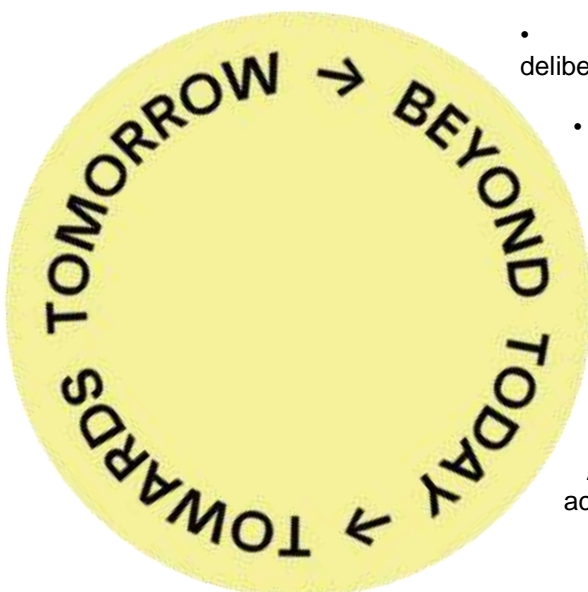
### What is Whistleblowing

Whistleblowing is the term referred to when an employee passes on information concerning wrongdoing that is typically, although not always, witnessed at work. It is a formal disclosure of alleged corruption, wrongdoing or malpractice made to the Line manager or Talent and Culture team. The Company's disclosure procedure must be used If an individual becomes aware of information which they reasonably believe tends to show one or more of the following;

- That a criminal offence has or will be committed
- That an individual has failed, is failing to comply with any legal obligation to which they are subject
- That a miscarriage of justice that has or is likely to occur
- That the health or safety of any individual is endangered in any way
- That the environment has been or is likely to be damaged.
- That information tending to show any of the above is being deliberately concealed.
- That the business or any associated person has been, or is receiving or offering bribes, as defined in Anti Bribery policy (G-5)

### Disclosure Policy

Individuals may have concerns about the events that are taking place at the Company, in the first instance concerns should be raised with a Line Manager or Talent and Culture team. When an individual feels that the informal route is not appropriate, they can make a formal disclosure. All disclosures will be treated fairly and consistently in accordance to the below procedure:



**Whistleblowing**

- Information which an individual reasonably believes aligns to one or more of the above malpractice should promptly be disclosed to the employees Line Manager so that any appropriate action can be taken. If it is inappropriate to make such a disclosure to the manager, the employee should speak to the Talent and Culture Manager.
- Concerns will be dealt with over a reasonable period of time and will be dealt with in confidence. The appropriate individual dealing with the concern will hold meetings with firstly the Whistle blower to gain more information about the concerns raised and share any supporting facts that support the claim.
- The Appropriate Person conducting the investigation will then notify the Executive Chairman and Managing Director (unless one or both is implicated) that a whistleblowing disclosure has been made, and conduct the investigation. The identity of the whistle-blower will be protected throughout this process.
- After reviewing all information, the agreed course of action will be decided upon and the Appropriate Person will consider the information and decide if an investigation needs to take place. All decisions will be made in line with the relevant internal policies (G-5 Anti Bribery and E-8 Disciplinary and Grievance)
- Whistleblowing incidents will be recorded on BambooHR by the Appropriate Person which outlines the date of the incident and who the Appropriate Person is.
- For further guidance in relation to this matter or concerning the use of the disclosure procedure generally, employees should speak in confidence to the Managing Director.

**Protection of the Whistle-blower**

Beyondly is committed to the Whistleblowing policy and individuals are encouraged to raise concerns about malpractice in alignment with the disclosure procedure above. All concerns will be treated in confidence and every effort will be made to ensure your identity is not revealed if this is your preference. Employees will suffer no detriment of any sort for making such a disclosure in accordance with the above procedure.

The Company will have zero- tolerance for any harassment or victimisation towards the Whistle blower, any instance will be taken seriously, and the appropriate action will be taken to ensure that any issues are dealt with in line with the Disciplinary and Grievance policy (E-8).

For further information and advice around whistleblowing individuals should review the Government website or ACAS.

**Untrue Allegations**

If an allegation that is made which is believed to be true, but it is not confirmed by the investigation, the Company will recognise the individual's concern. If however, an allegation is made maliciously or for personal gain, appropriate action may be taken in line with the Disciplinary and Grievance policy (E-8).



**G-6**

**Whistleblowing**

**Issue Number:** 2  
**Issue Date:** 11 April 2023  
**Issued by (Name):** Jessica Aldersley  
**Issued by (Signature):**



**Position:** Director

