

Whistleblowing Policy

Policy Statement

Telecom Plus plc and its subsidiary companies (the “**Company**” or “**we / us**”) is committed to conducting business with honesty and integrity, and to fulfil all our responsibilities to our customers, employees, shareholders, and the wider community. We expect all staff to maintain these same high standards.

We encourage staff to report suspected wrongdoing as soon as possible, and this policy sets out the way in which individuals may raise any concerns they may have. Concerns will be taken seriously and investigated as appropriate, and confidentiality will be respected.

All organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential to prevent such situations occurring, and to address them when they do occur. As such, we encourage openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken.

This policy does not form part of any contract of employment or other contract to provide services, and we may amend it at any time.

Who does this policy apply to?

This policy covers any person who wishes to raise the type of concern covered by this policy, including all employees, directors, officers, partners, consultants, contractors, workers, agency workers, volunteers, interns, apprentices, agents, sponsors, or any other person associated with the Company, or any of its subsidiaries or their employees, wherever located (collectively referred to as ‘**staff**’ in this policy).

Who is responsible for the policy?

The Board of Directors has overall responsibility for the effective operation of this policy, but has delegated responsibility for overseeing its implementation to the Audit & Risk Committee.

The Audit & Risk Committee is responsible for reviewing the effectiveness of actions taken in response to concerns raised under this policy, and for reviewing this policy on an annual basis to ensure that the policy complies with our legal and ethical obligations, and that all those under our control comply with it.

All staff are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing. Changes will be made as required to the policy, with any changes communicated to those it applies to. Updated versions of the policy will be made available on Babble.

What is whistleblowing?

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers in relation to the activities of the Company. This may include:

- criminal activity;
- miscarriages of justice;
- danger to health or safety;
- damage to the environment;
- failure to comply with any legal obligation or regulatory requirement;
- bribery, facilitating tax evasion, financial fraud or mismanagement, or money laundering;
- a breach of our internal policies and procedures (including our compliance manual and our policies on conflicts of interest and dealing with suppliers);
- conduct likely to damage our reputation or financial wellbeing; or
- the deliberate concealment of any of the above matters.

Staff must also immediately report any suspected misuse or unauthorised disclosure of confidential information, or suspected negligence, to the Audit & Risk Committee.

This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases, you should use our Grievance Procedure as appropriate. If a complaint relates to your own personal circumstances, but you also have wider concerns regarding one of the areas set out above (for example, a breach of

our internal policies and procedures), you should discuss with the Chief People Officer, the Legal & Compliance Director or the Company Secretary which route is the most appropriate.

Who is a whistleblower?

A Whistleblower is a person who raises a genuine concern relating to any of the above. You can raise your concern at any time about an incident that happened in the past, is happening now, or you believe will happen soon. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of the Company's activities, you should report it under this policy.

Raising a concern

We hope that in the first instance, you will be able to voice your concerns with your line manager or the People team, either in person or in writing. They may be able to agree a way of resolving your concern quickly and effectively.

However, where the matter is more serious, or if you feel your concerns have not been addressed appropriately by your line manager / the People team, or you prefer not to raise it with them for any reason, you should contact one of the following:

- the Chief People Officer;
- the Legal & Compliance Director; or
- the Company Secretary.

We also have a dedicated third-party hotline provided by Safecall, so you can be sure that you can submit your concerns in confidence. This service allows you to report online or by telephone, and can be used by anyone on an anonymous basis. You can contact Safecall by calling the freephone number 0800 915 1571 or report online at

<http://www.safecall.co.uk/report>.

Confidentiality

We hope that staff will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

We do not encourage staff to make disclosures anonymously, although we will make every effort to investigate anonymous disclosures. You should be aware that proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible.

Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to the Chief People Officer, the Legal & Compliance Director or the Company Secretary and appropriate measures can then be taken to preserve confidentiality.

Protection and support for whistleblowers

It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken.

Whistleblowers must not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform your line manager or the Chief People Officer immediately. If the matter is not remedied, you should raise it formally using our Grievance Procedure.

You must not threaten or retaliate against whistleblowers in any way. Anyone involved in such conduct will be subject to disciplinary action.

How we handle the concern

Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment. You may be required to attend meetings to provide further information.

In some cases, we may appoint an investigator or team of investigators, including staff with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.

We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us from giving you specific details of the investigation, or of any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

If we conclude that a whistleblower has made false allegations maliciously or with a view to personal gain, the whistleblower will be subject to disciplinary action.

Should you wish to take the matter further?

While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy, you can help us to achieve this. If you are not satisfied with the way your concern has been handled, you can raise it with one of the key contacts in this policy. Alternatively, you may contact the CEO or Chair of the Audit & Risk Committee.

Concerns with third parties

Whistleblowing concerns usually relate to the conduct of our staff, but they may sometimes relate to the actions of a third party, such as a client, supplier or service provider. In some circumstances the law will protect you if you raise the matter with the third party directly. However, we encourage you to report such concerns internally first in line with this policy. You should contact your line manager, the Legal & Compliance Director or the Company Secretary for guidance.

Disclosures to external bodies

The law also recognises that in some circumstances it may be appropriate for you to report your concerns to other external bodies, for example HMRC. As the aim of this policy is to provide an internal mechanism for reporting, investigating, and remedying any wrongdoing in the workplace, we would strongly encourage you to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Protect, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. Their website is <https://protect-advice.org.uk> and they can be contacted by calling 020 3117 2520.