



21. Public Interest Disclosure (Whistleblowing)

Reviewed By: Melissa Munnich

Review Date: 26th October 2024

The Company always strives to safeguard and act in the interest of the public and its employees.

This Policy and Procedure apply to all individuals connected to the Company, including employees, contractors, suppliers, volunteers, former employees, and any other person acting on behalf of the Company. Protections outlined in this policy extend to anyone reporting concerns under the conditions specified below, ensuring comprehensive support against any retaliation.

21.1 Action Against Public Interest

Employees are encouraged to bring to the attention of the Company any practices or actions of the Company, its employees, directors or other agents, which they believe is against the public interest in that the practice or action is:

- A criminal offence;
- A failure to comply with any legal or regulatory obligation;
- A miscarriage of justice;
- A danger to the health and safety of any individual; or
- An attempt to conceal information on any of the above.
- Breaches of environmental protection laws;
- Violations of data protection and privacy laws;

- Any other conduct that may cause harm to public interests, including the misuse of Company resources;
- Any conduct or practice that may adversely impact the Company's clients or their customers, including breaches of contract, unethical behaviour, or failure to deliver services to the required quality or standard.

Employees must not raise any concern within this Procedure other than those in the above list.

21.2 Raising a Concern

An employee should initially raise his or her concern about the above practices or actions with the Compliance Officer melissa.munnich@woodhurst.com who will notify the employee in writing of any necessary remedial action taken.

The Compliance Officer will review the concern and notify the employee of the investigation's initial findings and any necessary remedial actions within 30 days of receiving the report. Updates will continue to be provided at regular intervals throughout the investigation to keep the employee informed on the status and progress of their concern. Where concerns raised under this policy materially impact a client or their customers, the Company will assess whether the concern should be escalated to the affected client in a timely and appropriate manner.

Where the employee is dissatisfied with the response then he or she should raise the matter in writing directly with one of the Company Directors.

Where the employee who raises the concern is found to be culpable or in any way involved in the practice or action or if the employee raises the concern maliciously or in a manner not prescribed in the Procedure above, then he or she may be subject to the appropriate disciplinary action.

Employees are strictly not permitted to publicise their concerns either verbally or in writing.

This Policy and Procedure have been designed to ensure employees do not feel the need to raise concerns anonymously.

Employees may raise concerns anonymously if they prefer. The Company encourages transparency but acknowledges that anonymous reporting can be necessary to ensure employee confidence and protection. Anonymous reports will

be reviewed and handled in the same manner as reports received with identification, ensuring an objective investigation. Following the detection of a whistleblowing event, the Company will conduct a Root Cause Analysis to identify underlying causes and implement preventative measures to reduce the risk of recurrence.

If an employee feels that reporting through internal channels is not appropriate or has concerns about potential bias, the employee may raise their concerns with an independent, external whistleblowing agency, or the relevant regulatory body. The Company acknowledges employees' rights to report externally and will not obstruct or penalise any employee who chooses this option.

Training on this Whistleblowing Policy is provided to all employees as part of their induction and is refreshed periodically. The training emphasises employees' right to report any concerns freely, including concerns that may affect clients or their customers, and explains the protections in place for those who raise issues.

21.3 Protection Against Retaliation

Any employee raising such concerns will not be subject to any detriment either during or after his or her employment. The Company will also endeavour to ensure that the employee is protected from any intimidation or harassment by any other parties. The Company strictly prohibits any form of retaliation against individuals raising concerns under this policy. Retaliation includes, but is not limited to:

- Demotion
- Termination
- Salary reduction
- changes in job responsibilities
- or any other adverse action that might deter the reporting of legitimate concerns.

Any retaliatory conduct will be subject to disciplinary action. Similarly, failure by relevant management to take appropriate action in response to legitimate whistleblowing concerns will result in formal internal disciplinary procedures.

21.4 Data Protection

All whistleblowing reports and related investigations will be handled in compliance with applicable data protection laws. The identity of the whistleblower, as well as the information disclosed, will be kept confidential to the fullest extent possible, shared only with individuals necessary for investigating and addressing the issue. The Company ensures that all personal data will be securely processed and stored.

21.5 Further Support

The Company values and supports the role of whistleblowers in promoting ethical practices. Whistleblowers are entitled to specific rights and protections under applicable laws. Employees raising concerns are encouraged to seek further information on their rights and protections if needed. The Company will also provide access to resources, including potential legal advice or counseling, where necessary, to support employees through this process.

Woodhurst has a zero-tolerance approach to modern slavery and human trafficking. Any concerns relating to modern slavery can be reported through this whistleblowing process. Such concerns will be prioritised and escalated immediately to the Compliance Officer for urgent review and appropriate remediation.