



## Whistleblowing Policy

### Information Security

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### Version History

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## 1. Policy Statement

Phaidon International (“the Company”) is firmly committed to maintaining the highest standard of ethics, honesty, and integrity in all its dealings.

The aim of this policy is to offer a straightforward method for **third parties** to raise serious and genuine concerns about any wrongdoing connected to the Group. Third parties who may make use of this policy include the Group's clients, candidates, contractors, temporary and casual workers the Group engages for assignment at a client, suppliers, staff spouses or children, and dependents of staff or their spouse.

If you are an employee or worker of the Group, you should not use this policy. Instead, you should refer to our SpeakUp policy which can be found [here](#).

## 2. What is Whistleblowing?

Someone “blows the whistle” when they report matters (including but not limited to) a genuine belief of potential dangers or wrongdoing at work such as health and safety risks, potential environmental damage, fraud, cover-ups or corruption, to someone who has the authority to do something about it.

Under Whistleblowing laws, qualifying disclosures include one which, (in the reasonable belief of the worker making the disclosure), suggests that one or more of the following has been committed, is being committed or is likely to be committed:

- A criminal act
- A breach of a legal obligation (such as negligence or breach of internal rules and regulations)
- Miscarriage of Justice
- Danger to health and safety
- Bribery
- Financial fraud or mismanagement
- Damage to the environment
- Conduct likely to damage the reputation or financial wellbeing of the Company
- Unauthorized disclosure of confidential information
- Victimization of anyone raising a Whistleblowing concern



- Deliberate covering up of information tending to show any of the matters above.

This policy and process are not intended for complaints about the service you have received, employment-related matters or commercial disputes unless they fall into the definition of wrongdoing or malpractice set out above.

### 3. Raising a Concern

Any individual who genuinely and reasonably has a malpractice concern should inform their day to day contact at the company as an initial step. In the event that this is not considered to be appropriate, concerns should be reported to a member of the HR team in person or in writing at the following address: [hr@phaidoninternational.com](mailto:hr@phaidoninternational.com).

Note, in some countries, Whistleblowing Concerns must be raised with specified persons or authorities in order for the Whistleblower to have the protections provided for under local laws.

All concerns raised will be taken seriously and investigated to its full extent. An initial assessment will be carried out to determine if further information is needed or a confidential meeting should be booked. A confidential meeting may then be held to discuss your concern.

### 4. Your Protection

We hope that people will feel able to voice whistleblowing concerns openly under this policy. However, if any individual wants to raise their concern confidentially, we will make every effort to keep their identity secret. Although, this may not always be possible. Concerns expressed anonymously will be acted upon where possible, however due to the difficulties of investigating anonymous allegations, we encourage individuals to come forward. If the situation should arise where it is not possible to resolve a concern without revealing the identity of the individual who raised it, the Company will discuss with the relevant individual how to proceed.

It is understandable that whistleblowers may be concerned about possible repercussions. We aim to encourage openness and will support individuals who raise genuine concerns in good faith under this policy, even if they turn out to be mistaken.



Individuals will not suffer any detrimental treatment because of raising a concern in good faith. Detrimental treatment includes threats or any other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the email address listed above. If the matter is not remedied, you should raise it formally to our CHRO.

Staff must not threaten or retaliate against whistleblowers in any way. Anyone involved in such conduct will be subject to disciplinary action, which could include dismissal or termination of an assignment.

In order to qualify for protection, the individual must ensure that they are making a “qualifying disclosure”. The individual must honestly and reasonably believe that the information and any allegation in it are substantially true; making sure that the disclosure is reasonable in all of the circumstances and, not make the disclosure for personal gain.

a. False allegations

Individuals who raise a concern in good faith, which is shown to be unsubstantiated by the investigation, will not have action taken against them. However, if anyone makes a frivolous or malicious allegation, makes an allegation for personal gain, or makes an allegation knowing it to be untrue, then further action will be taken to address the matter.

## 5. Procedure for external regulatory disclosure

This policy is intended to provide third party individuals with an internal mechanism for raising concerns with the Company. The Company hopes that anyone making use of the policy will be satisfied with any action taken and should not find it necessary to alert anyone externally.

## 6. Response

Once the concern or disclosed information has been reported, the Company will look into the matter to initially assess what action should be taken.

The Company will institute the appropriate enquires and/or investigations



- The Company will tell you who is handling the matter and how you can contact them; and
- Advise whether your further assistance may be requested

While the main purpose of the policy is to enable the Company to investigate possible incidents and take appropriate steps to deal with it, the Company will endeavour to provide the complainant with as much feedback as possible. However, we may not be able to tell you the precise action we take where this would infringe on a duty of confidentiality owed by us to someone else. Individuals should treat any information about our investigation as confidential.

This policy does not form part of any terms of business or relevant contracts and it may be amended at any time – to reflect changes in the law, for example.