

Gamma Group Whistleblowing Policy

Gamma Communications plc (“Gamma”)

Introduction

Gamma Communications plc and its subsidiaries are committed to the highest standards of openness, integrity, and accountability, and we expect all staff to maintain these high standards in accordance with our values, policies, and procedures.

An important aspect of accountability and transparency is a mechanism to enable employees and other members of the Company to voice concerns in a responsible, timely and effective manner. If you discover information which you believe shows possible improprieties in matters of financial reporting or other serious malpractices or wrongdoing within the organisation then this information should be disclosed internally without fear of reprisal. This policy is designed to support an open, transparent, and safe working environment where you feel empowered to speak up confidentially and independently of line management. We recognise that raising a whistleblowing concern can be daunting, however, we encourage you to report concerns internally as soon as possible. We are here to listen and will take all concerns that you raise seriously.

The Public Interest Disclosure Act gives legal protection to employees against being dismissed or penalised by their employers because of raising legitimate concerns about specific matters called “qualifying disclosures”. A “qualifying disclosure” means any disclosure of information which, in the reasonable belief of the employee shows one or more of the following events either has been, is being or is likely to be committed:

1. Financial malpractice or fraud
2. Corruption, bribery, or blackmail
3. Any criminal offence
4. A failure to comply with legal obligations or statutes
5. A miscarriage of justice
6. The endangering of the health and safety of any individual
7. Endangering the environment
8. Deliberately concealing information relating to any of the above

Aims and Goals

This policy is designed to:

1. Support and maintain our company values
2. Ensure that employees and others can raise concerns without fear of reprisal or retribution
3. Provide a transparent, easy to use and confidential process for dealing with concerns
4. Adhere to legislation related to this policy

Scope

This policy applies to all employees and workers employed by the Gamma Group. Other individuals, including our contractors, subcontractors, suppliers and volunteers are also encouraged to follow this policy.

Policy statements

Protection

This policy is designed to offer protection to you provided the disclosure is made in good faith and in the reasonable belief that it shows malpractice or wrongdoing, and that the disclosure is made to an appropriate person, in line with this policy and any related procedures.

Confidentiality

The company will treat, as far as is reasonably practical, all such disclosures in a confidential and sensitive manner.

We want you to feel comfortable about raising a confidential whistleblowing concern and actively encourage you to do so. Where you raise a whistleblowing concern openly, we will maintain your confidentiality as far as possible. If we need to share your identity with anyone, we will notify you beforehand.

Whether you decide to raise a whistleblowing concern anonymously or openly, you can do this via our internal whistleblowing hotline or via an online report (details can be found on your local intranet page).

We encourage anonymous reporting rather than remaining silent. Although we will investigate any concern that is reported anonymously as best we can, an anonymous report is likely to be more difficult for us to investigate and we will not be in a position to provide you with any feedback.

Raising a whistleblowing concern

You can raise your concern at any time about an incident that happened in the past, is happening now or you believe may happen in the future. All concerns raised will be treated seriously, including concerns reported anonymously.

If you have a genuine concern relating to any type of wrongdoing outlined in this policy, you can raise this via our independent third party Safecall. Safecall provide an independent confidential reporting line and online portal where you can raise your concerns. Calls are handled by trained staff and will be treated in complete confidence. A report of the call will be sent to the Whistleblowing Officers (see roles and responsibilities below). Safecall will not disclose your name if you wish to remain anonymous.

Safecall is available 24 hours a day, 7 days a week and 365 days of the year.

You can report a concern in two ways:

1. Phone - call Safecall and talk to someone in your local language (www.safecall.co.uk/freephone)
2. Online - raise a report online via this link www.safecall.co.uk/report

Any call/report you make will be treated in the strictest of confidence as outlined above. Each Gamma Group location has access to this policy via their intranet. There is a separate procedure document ("Whistleblowing Procedure") detailing local phone numbers for all our locations and what to expect once a call has been made. For further details please refer to your local intranet or People Team representative.

Roles and Responsibilities

Role	Responsibility
Whistleblowing Officers (Independent Non-Executive Board Directors)	<p>Review independently any whistleblowing reports received via Safecall and decide whether to send it to the Whistleblowing panel.</p> <p>Appoint an external investigating officer if the report is not appropriate to send to the Whistleblowing panel.</p>
Whistleblowing Panel	<p>Review reports received from employees via Safecall.</p> <p>Meet and assess the report to decide if it is a whistleblowing case.</p> <p>Appoint an Investigating Officer if it is decided the report falls within this policy.</p> <p>Refer the case to the People Team if it is deemed it falls under the local grievance procedure rather than a whistleblowing case.</p>
Investigating Officer	<p>Manage the case as an independent and objective leader who has no direct involvement with the individual raising the concern (where known) or the individual the report is about.</p> <p>Report the case, if appropriate, to the Police or other local bodies and notify the Whistleblowing panel.</p> <p>Produce a report detailing their findings, conclusion, and recommendations, which will be sent to the Whistleblowing panel to review and agree next steps.</p> <p>Responsible for reporting any concerns by the individual who raised the case if they are dissatisfied with the way the investigation is handled.</p> <p>Provide feedback to the individual (if appropriate to do so).</p>
ExCo	<p>Promote Gamma values and behaviours and act as role models for managers and employees to raise any concerns without fear of reprisals.</p> <p>Demonstrate commitment to this policy by communicating and reinforcing the importance of this policy for all.</p> <p>Mitigate any risk(s) to Gamma by dealing with any disclosures quickly and efficiently.</p>
People Team	<p>Promote Gamma's values including a culture of speaking up.</p> <p>Undertake regular reviews of key policies and procedures.</p> <p>Signpost employees to this policy and local procedures.</p> <p>Support managers to understand this policy.</p>
Line Manager	<p>Act as a role model to encourage teams to speak openly.</p> <p>Manage and deal with disclosures in a prompt manner, seeking support from the People Team as needed and reducing any potential risk to Gamma.</p> <p>Provide relevant support to team members by providing information and maintaining confidentiality.</p> <p>Mitigate any risk to Gamma by seeking support where needed and not attempting to cover up any disclosures made.</p>
All employees	<p>Raise any concerns related to wrongdoing promptly.</p> <p>Take personal responsibility for gaining understanding of this policy and associated procedures.</p>

Governance and Reporting

Whistleblowing matters should be reported based on the guidance in this policy. For further information regarding the Whistleblowing procedure, please refer to our 'Whistleblowing Procedure' document, which should be read in conjunction with this policy (these can be found on your local intranet pages).

Enforcement

Your concerns are important to us, and any concerns raised by you will be taken seriously. Where concerns are raised and they fall under our local people policies this will be advised to you. If we find that you have knowingly raised false allegations, this will be treated as a disciplinary offence and will be dealt with under our disciplinary procedure.

Document Control

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