

Whistleblowing Policy

(PPP016)



Whistleblowing Policy

1 Policy Statement

We always aim to conduct ourselves ethically, and with honesty and integrity. We expect the same high standards from all our employees and supply chain partners.

We do, however, recognise that there may be occasions when we (or our employees and supply chain partners) do not get this right. In these instances, you may feel that you need to raise your genuine and serious concerns through this whistleblowing policy.

2 Aims of this policy.

The aims of this policy are to:

- Provide an effective way for you to raise serious concerns.
- Ensure that you receive feedback on any action undertaken by us because of you raising serious concerns.
- Ensure that you will be protected from reprisals or victimisation for having raised your concern in good faith.
- Signpost you to further options available to you if you are dissatisfied with our response, or if internal investigation is not appropriate.
- Allow the company to take action against any employee who makes allegations in bad faith and/or publicly discloses information when it is unreasonable for them to do so.

3 Who this policy applies to

This policy applies to everyone who works for the company. This means Papilo employees, contractors, suppliers, and investors.

4 Definition of whistleblowing

Whistleblowing' is a term used to refer to the internal or external disclosure of malpractice as well as illegal acts, or omissions, at work. It covers, for example, how we manage our finances, how we commission work or make payments.

5 Protecting individuals using this policy.

The Public Interest Disclosure Act 1998 amended the Employment Rights Act 1996 and it provides protection for individuals who raise legitimate concerns about specified matters, outlined below.

These are called qualifying disclosures. A qualifying disclosure is one made in good faith by an individual who has a reasonable belief that:

- A criminal offence (including fraudulent and corrupt behaviour, eg theft, fraud, or malpractice).
- A miscarriage of justice.
- An act creating risk to health and safety.
- An act causing damage to the environment.
- A breach of any other legal obligation.
- Concealment of any of the above.

It is not necessary for you to have proof that such an act is being, has been, or is likely to be, committed. You do, however, need to hold a reasonable belief of such an action having been, being or likely to be carried out.

If you make such a protected disclosure, you have the right not to be dismissed, subjected to any other detriment, or victimised. This is the case even were it to materialise that you were genuinely mistaken. We will not tolerate any individual being subjected to a detriment because of their making a disclosure in good faith.

Under the law, supply chain partners are not afforded the same legal protection that is afforded to employees. Papilo however, wishes to promote and encourage an open and honest environment in which concerns can be freely raised. We will therefore, in so far as is possible, aim to treat all individuals making a disclosure in the spirit of the Public Interest Disclosure Act 1998.

6 Malicious disclosures

If it is found that you have maliciously raised a matter which you know to be untrue or you are involved in any way in the malpractice, wrongdoing or illegal acts or omissions, your behaviour may be addressed through the appropriate company policy.

7 Non-whistleblowing concerns

This policy is only to be used in the exceptional circumstances as outlined in section 5, above. There are several company policies that will be relevant in other circumstances.

This list includes but is not limited to:

- Child Labour Remediation (PPP007)
- Harassment & Bullying (PPP011)
- Complaints & Dispute Resolution (PPP010)

Further information may also be found in the Employee handbook (PPP017).

8 Raising a concern.

You should raise your whistleblowing concern as soon as possible. This will make it easier to act and to enable any problems to be resolved or reported quickly.

You can make your disclosure orally, but written disclosures are preferable as these will make the process more efficient and effective. In your disclosure, you should:

- Provide any relevant context and background, including relevant dates, venues, names etc.
- Clearly state the reason why the situation causes concern.

You must say that you are raising your concern using the whistleblowing policy and whether you wish your identity to be kept confidential. While we will make every effort to deal with your case confidentially, depending on the circumstances of the case this may not always be possible. Where this is the case, you will be informed of this and the reasons why it was not possible.

We will consider anonymous disclosures, but we do not encourage them as anonymity often makes it difficult to properly investigate concerns, protect employees or give feedback on outcomes.

9 Who should I raise my concerns with?

You should always look to raise the matter with your line manager in the first instance. Where this is not appropriate because they may be involved in the alleged malpractice, wrongdoing or illegal acts or omissions in some way, raise your concern with an appropriate member of the senior management team. In some circumstances where it would be inappropriate for you to approach your manager or a member of the senior management team you should raise the matter directly with the Chief Executive Officer.

Where a concern is about the Chief Executive Officer or an investor, you should contact the Company Chairman.

If appropriate, the company chairman may arrange for the concern to be investigated externally and independent of Papilo, and for appropriate follow-up action to be taken.

10 What happens after I raise my concern?

- Your disclosure will always be acknowledged within three working days.
- It will be investigated by the Papilo manager or senior officer that you raise your concern to.
- They will arrange to meet you as soon as possible, away from the workplace, if necessary, to enable you to explain your concern, as outlined in section 8 above.
- As per section 8 above, we may not always be able to keep your details confidential, but we will always let you know if it is not possible to do so.
- You will be told either at the meeting or as soon as possible afterwards, what action will be taken to address the concern you have raised. Where action is not taken, you will be informed and given an explanation. The action taken in response to a disclosure will depend on the nature of the concern.

Typically, the matters raised may result in one or more of the following:

- No action required.
- Action being taken under other Papilo policy or procedure.
- An internal investigation under this policy.
- A referral to the police or relevant statutory body.
- An independent enquiry.

Any Papilo manager or member of the senior management team receiving a potential whistleblowing concern must notify the Chief Executive Officer immediately (unless the action pertains to them) that a concern has been raised and inform them of progress in resolving the concern.

11 Raising a concern externally.

We strongly encourage you to exhaust the internal processes set out above in the first instances. In exceptional or urgent circumstances, however, or where, having made a disclosure, you are unhappy with the outcome, you have a legal right to make a disclosure to prescribed bodies.

These include but are not limited to:

- HM Revenue & Customs
- The Health and Safety Executive
- The Office of Fair Trading
- The Environment Agency

Similar to the rights and obligations of an employee, Papilo reserves the right to make a referral to any of the above agencies without your consent.

12 Making a disclosure to the press.

Disclosures to the press will not be considered reasonable and may constitute misconduct. As such, the matter might be treated as a disciplinary matter in accordance with our disciplinary policy.

13 Further help & assistance.

If, at any stage in the procedure, you are unsure about what to do and would like independent advice, you can discuss your concern with someone at 'Protect' (protect-advice.org.uk). This body is an independent charity staffed by lawyers, which offers confidential free legal and practical advice on how people can raise concerns about malpractice at work.

They can also provide advice about what legal protection may be available to you.

14 Director sign-off

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