

BEYONDLY

G-6

Whistleblowing

Purpose

In line with Beyondly's values and commitment to integrity, transparency, and accountability, this policy sets out how individuals can raise concerns about suspected wrongdoing, malpractice, or unethical behaviour.

Beyondly is committed to creating an open and supportive culture where concerns can be raised safely and responsibly. We encourage individuals to speak up if something does not feel right and are committed to ensuring that concerns raised in good faith are taken seriously and handled appropriately.

This policy supports Beyondly's zero-tolerance approach to bribery, fraud, corruption, and other forms of misconduct.

Scope

This policy applies to:

- All Beyondly employees
- All third parties acting on behalf of Beyondly, including suppliers, and partners
- All Beyondly activities, operations, and business relationships

Definition of Whistleblowing

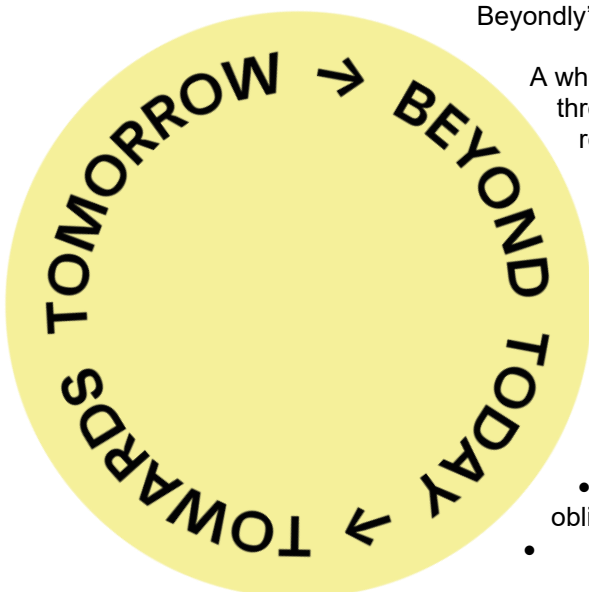
Whistleblowing is the disclosure of information relating to suspected wrongdoing that is usually (though not always) identified in the workplace or in connection with Beyondly's operations.

A whistleblowing disclosure is a formal report of concerns made through the appropriate reporting channels where an individual reasonably believes that wrongdoing has occurred, is occurring, or is likely to occur.

Reportable Concerns

Concerns should be raised under this policy where an individual reasonably believes that one or more of the following has occurred, is occurring, or is likely to occur:

- A criminal offence, including fraud, theft, bribery, or corruption
- A failure to comply with any legal, regulatory, or contractual obligation
- A miscarriage of justice



Whistleblowing

- A risk to, or breach of, the health and safety of any individual
- Environmental damage, or actions likely to cause such damage
- Fraudulent activity, including:
 - Theft or misuse of funds, assets, or information
 - False, misleading, or inflated expense, payroll, or invoice claims
 - Manipulation or falsification of records
 - Procurement or supplier-related fraud
 - Misuse of Beyondly systems or data, including cyber-enabled fraud
 - The offering, giving, receiving, or solicitation of bribes or improper inducements, as defined in the Anti-Bribery Policy (G-5)
 - The deliberate concealment of information relating to any of the above

This policy is not intended to replace normal day-to-day management of minor issues or personal grievances, which should be raised through standard HR or management processes.

Role and Responsibilities

All Employees

- Act in line with Beyondly's values, policies, and codes of conduct
- Remain alert to potential wrongdoing
- Raise concerns promptly and in good faith
- Co-operate with any investigation where required

Leaders and Managers

- Promoting a culture where speaking up is encouraged and supported
- Taking concerns seriously and escalating them appropriately
- Ensuring concerns are handled sensitively and confidentially
- Preventing retaliation against individuals who raise concerns

All Personnel and Representatives

- Act in line with Beyondly's Supplier Code of Conduct
- Comply with contractual, legal, and ethical requirements
- Raise concerns relating to Beyondly promptly and responsibly

How to Raise a Concern

Concerns should be raised as soon as possible and can be reported to:

- A Line Manager (for acts by employees)
- A member of the Talent and Culture team (for acts by employees)
- A member of the Senior Management Team (for acts by employees and external stakeholders)
- The Quality Manager (for acts by external stakeholders)

Concerns may be raised verbally or in writing and should include as much relevant information as possible.

Protection and Confidentiality

Beyondly is committed to ensuring that individuals who raise concerns in good faith:

- Are treated fairly and respectfully
- Are protected from retaliation, victimisation, or disadvantage
- Have their concerns handled confidentially, where possible



Whistleblowing

The Company will have zero- tolerance for any harassment or victimisation towards the whistle-blower, any instance will be taken seriously, and the appropriate action will be taken to ensure that any issues are dealt with in line with the E-8 Disciplinary Policy and Procedure, E-20 Grievances Policy, and QP06 Complaints Procedures.

For further information and advice around whistleblowing individuals should review the Government website or ACAS.

Incident Management

- Concerns will be acknowledged within 48 hours and dealt with over a reasonable period of time.
- The appropriate individual dealing with the concern will hold meetings with firstly the whistle-blower to gain more information about the concerns raised and share any supporting facts that support the claim.
- The Appropriate Person conducting the investigation will then notify the Managing Director (unless one or both is implicated) that a whistleblowing disclosure has been made and conduct the investigation. The identity of the whistle-blower will be protected throughout this process.
- After reviewing all information, an agreed course of action will be decided upon, and the Appropriate Person will consider the information and decide if an investigation needs to take place. This should include preventative actions to prevent a repeat occurrence. All decisions will be made in line with the relevant policies (G-5 Anti Bribery, E-8 Disciplinary Policy and Procedure, E-20 Grievances Policy, G-32 Anti-Fraud Policy and QP06 Complaints Procedure).
- Whistleblowing incidents, including details of the investigations and actions, will be recorded on Employee Hero (internal) or the CMS (external) by the Appropriate Person which outlines the date of the incident and who the Appropriate Person is.
- The appropriate person is responsible for ensuring all actions are completed and closed off.

Untrue Allegations

If an allegation that is made which is believed to be true, but it is not confirmed by the investigation, the Company will recognise the individual's concern. If however, an allegation is made maliciously or for personal gain, appropriate action may be taken in line with the E-8 Disciplinary Policy and Procedure, E-20 Grievances Policy, and QP06 Complaints Procedures.

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Issued by (Name): Jessica Aldersley

Issued by (Signature):



Position: Director

