

Global Whistleblowing Policy

1. ABOUT THIS POLICY

- 1.1 discoverIE Group plc (the “**Company**”) is committed to conducting its business with honesty and integrity, and we expect all Group Employees and Workers (as defined below)¹ to maintain high standards. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring and to address them when they do occur.
- 1.2 The purpose of this policy is to provide a procedure for reporting, investigating and addressing any wrongdoing in the workplace and affecting work activities.
- 1.3 The aims of this policy are:
 - (a) To encourage Group Employees and Workers to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.
 - (b) To provide Group Employees and Workers with guidance on how to raise their concerns.
 - (c) To reassure Group Employees and Workers that they can raise genuine concerns, which are in the public interest, without fear of reprisals, even if they turn out to be mistaken, provided that their belief is reasonable and there is no malicious intent in the disclosure.
- 1.4 For the purposes of this policy, the term “Group Employees and Workers” means all employees, officers, consultants, contractors, interns, hired-in employees², casual workers and agency workers of the Company and its subsidiary undertakings (and “Group Employees or Workers” shall be construed accordingly).
- 1.5 This policy does not form part of any Group Employee’s or Worker’s contract of employment or engagement and the Company may amend it at any time.

2. WHAT IS WHISTLEBLOWING?

- 2.1 Whistleblowing is the optional and voluntary disclosure of information which relates to suspected wrongdoing or dangers at work. This policy is intended to cover concerns which are raised in the public interest and may, at least initially, be investigated separately, but might then lead to the invocation of other policies, e.g. disciplinary. These concerns may include:
 - (a) Specific criminal offences provided by law (such as financial, banking, bribery and anti-competitive practices), including (but not limited to) fraud, bribery,

¹ For all Group employees working in France or Slovakia, please refer to the relevant country’s specific Whistleblowing Policy.

² Hired-in employees means temporary workers or personnel hired from agencies or other enterprises that have a temporary surplus of labour (as an alternative to redundancy).

influence peddling, taking illegal advantage and embezzling public funds;

- (b) Disregard for legislation, particularly in relation to health and safety at work;
- (c) Malpractice, or ill treatment of a customer or supplier by a Group Employee or Worker³;
- (d) Serious damage to the environment;
- (e) Failure to comply with legal or professional obligations;
- (f) Miscarriages of justice; and
- (g) Discrimination and/or harassment at work⁴.

- 2.2 A whistleblower is a person who raises a genuine concern which is, in the Group Employee's or Worker's reasonable belief, in the public interest, relating to any of the above. Any Group Employee or Worker who has genuine concerns relating to the suspected wrongdoing or danger affecting any of the Group's activities should report it in accordance with this policy.
- 2.3 Concerns raised will usually relate to the conduct of the Company or our employees, but they may sometimes relate to the actions of a third party, such as a customer or contractor. If so, we encourage you to raise any concerns you may have about a third party internally in accordance with the procedure set out in this policy.
- 2.4 This policy should not be used for complaints relating to a Group Employee's or Worker's personal circumstances, such as the way they are treated at work. In those cases, the Group Employee or Worker should use the Grievance Procedures or Anti-Harassment and Bullying policy as appropriate.

3. RAISING A WHISTLEBLOWING CONCERN

- 3.1 We hope that in many cases you will be able to raise any concerns about wrongdoing and malpractice (including any supporting facts, information or, if any, supporting documents) with your line manager (whether immediate line manager or not). They may be able to agree a way of resolving your concern quickly and effectively. Where appropriate, they will refer the matter to the Designated Officer (as defined below).
- 3.2 If you consider it more appropriate or easier to raise your concern (including any supporting facts, information or, if any, supporting documents) in the first instance, via the Group's confidential reporting line, Safecall, you may do so. Safecall provide an independent confidential reporting line where you can raise your concerns and be assured they will be fully addressed. Reports are handled by skilled staff and will be treated in complete confidence. All matters reported in this way will be referred to the Designated Officer. Safecall will not disclose your name to the Company if you wish to remain anonymous.

You can contact Safecall at any time on the applicable Freephone number below:

³ This does not apply to Group employees working in France or Slovakia, please refer to the relevant country's specific Whistleblowing Policy.

⁴ Employees in Norway have an obligation to notify the employer or the safety representative as soon as they become aware of harassment or discrimination at the workplace.

Country of Operation	Telephone Number
Belgium	00800 72332255
Canada	1 877 599 8073
China (Telecom)	10800 4400682
China (Unicom/Netcom)	10800 7440605
Denmark	00800 72332255
Finland (Telia Sonera)	990 800 72332255
Finland (Elisa)	999 800 72332255
France	00800 72332255
Germany	00800 72332255
Hong Kong	3077 5524
India	000800 4401256
Italy	00800 72332255
Netherlands	00800 72332255
Norway	00800 72332255
Poland	00800 72332255
Slovakia	0800 004996
South Africa	00800 72332255
South Korea (Telecom)	001 800 72332255
South Korea (Dacom)	002 80072332255
Sri Lanka	2423109
Sri Lanka (If outside Colombo)	011 2423109
Sweden	0850 252 122
Thailand	001 800 72332255
UK	0800 9151571
USA	1 866 9013295

The Safecall line is available 24/7 365 days. Alternatively, Safecall can be contacted via the web www.safecall.co.uk/report

- 3.3 If you consider it more appropriate to raise your concern (including any supporting facts, information or, if any, supporting documents) with the Designated Officer directly, you may do so via the email address below. You must include the word “Whistleblowing” in the subject heading of your email.
- 3.4 You can also raise your concern indirectly via employee representatives, safety representatives or another representative.
- 3.5 The following person is the Designated Officer under this policy and they are subject to a specific confidentiality obligation. They have direct access to the Chairman of discoverIE Group plc:

Greg Davidson	Group Secretary	Company Email: whistleblowing@discoverIEplc.com
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Only the Designated Officer has access to the email address specified above. If the Designated Officer changes at any time, you will be notified of this.

- 3.6 The Designated Officer will arrange a meeting or a telephone call with you as soon as possible to discuss your concern. You may bring a colleague to any meetings that are arranged under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.
- 3.7 We will take down a written summary of your concern and provide you with a copy after the meeting to ensure it has been accurately recorded. We will also aim to give you an indication of how we propose to deal with the matter and a proposed timeline.
- 3.8 If you are uncertain whether something is within the scope of this policy, you should feel free to seek advice from the Designated Officer.

4. CONFIDENTIALITY

- 4.1 We hope that Group Employees and Workers will feel able to voice whistleblowing concerns openly under this policy. All information provided by you will be treated on a strictly confidential basis. Your identity will be treated confidentially by the Designated Officer as far as reasonably practicable and will only be revealed where necessary. You will be notified where disclosure has taken place.
- 4.2 We do not encourage staff to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. However, if you do wish to make an anonymous report, we would recommend doing so via the external reporting line (details of which are set out in paragraph 3.2 above).
- 4.3 Anonymous reports will only be admissible if the seriousness of the facts is duly established with sufficient supporting details, but subject to preliminary examination by the Designated Officer.

5. INVESTIGATION AND OUTCOME

- 5.1 Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment. You may be required to attend additional meetings or calls in order to provide further information.
- 5.2 In some cases, we may appoint an investigator or team of investigators with relevant experience of the subject matter. Your identity shall remain confidential and the investigation will be carried out in strict confidence. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.
- 5.3 We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.
- 5.4 If we conclude that a whistleblower has made false allegations maliciously, or with a view to personal gain, the whistleblower will be subject to disciplinary action. Any abusive use of this procedure may expose you to legal proceedings, in addition to disciplinary sanctions.

6. IF YOU ARE NOT SATISFIED

- 6.1 While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy, you can help us achieve this.
- 6.2 If you are not happy with the way in which your concern has been handled, we recognise your right to make disclosures to external bodies including prescribed regulators or, where justified, elsewhere, subject to complying with local law.

7. EXTERNAL DISCLOSURES

- 7.1 The aim of this policy is to provide internal mechanisms for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone outside of the Company.
- 7.2 While in some rare cases it may be appropriate for you to report your concerns to an external body such as a regulator, it will very rarely if ever be appropriate to alert the media. It should be borne in mind that media organisations have their own commercial interests to pursue, and are not the appropriate bodies for resolving regulatory concerns.

8. PROTECTION AND SUPPORT FOR WHISTLEBLOWERS

- 8.1 It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support Group Employees and Workers who raise genuine concerns under this policy, even if they are mistaken. This policy is designed to offer protection to those Group Employees and Workers who disclose such concerns provided that the disclosure is made:
 - (a) in the reasonable belief of the Group Employee or Worker that the disclosure shows malpractice or impropriety; and
 - (b) in accordance with this policy.

It is important to understand that, to the extent permitted by applicable law, no protection from internal disciplinary procedures is offered to those who choose not to use this procedure or who abuse this procedure.

- 8.2 Whistleblowers under this policy must not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes (but is not limited to) dismissal, disciplinary actions, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered such treatment you should inform the Designated Officer. If the matter is not remedied or you are not happy with the way in which your concern has been handled, you should raise it formally with the Designated Officer.
- 8.3 You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct, you may be subject to disciplinary action.
- 8.4 The elements that may identify you and the individuals concerned within the framework of a complaint:
 - (a) Will be destroyed without delay if the concern is not eligible under this procedure;
 - (b) Will be destroyed when there is no case within two months of the end of the eligibility or investigation steps,

unless it is required to be stored in accordance with mandatory legislation; and

- (c) If any, will be kept until the end of legal proceedings.

9. THE LAW

- 9.1 This procedure is intended to complement any local legislation which protects Group Employees and Workers making disclosures about certain matters of concern.
- 9.2 You are hereby informed of your right to access and modify your personal data, in accordance with local legislation. You can exercise your rights by contacting the Group Company Secretary.

Approved by the Board of discoverIE Group plc

March 2019