



Whistleblowing Policy

Introduction

This policy applies equally across all Supreme Group businesses (hereafter, "The Company").

1. Purpose and scope

This policy applies to all employees within the Company and any approved 3rd party suppliers operating on behalf of the Company.

The Company is committed to upholding high ethical standards and fostering transparency, integrity, and accountability. Addressing any fraud, misconduct, or wrongdoing is a priority. This policy outlines the process for individuals to raise concerns about such issues, ensuring these concerns are handled confidentially, and safeguarding whistleblowers from any form of reprisal. This policy sets out the way in which individuals may raise concerns they have about wrongdoing, and how those concerns will be dealt with.

The procedure in this policy is for disclosures about matters other than a breach of an employee's own contract of employment. If an employee is concerned that their own contract has been, or is likely to be, broken, they should speak, in the first instance, with HR.

The Company encourages colleagues to raise their concerns under this procedure in the first instance. If a colleague is uncertain whether or not to raise a concern, they should discuss the issue, in the first instance, with their line manager or the HR team.

2. Legal background

The law (The Public Interest Disclosure Act (PIDA) 1998) provides protection for workers who raise legitimate concerns about specified matters. These are called "qualifying disclosures".

A qualifying disclosure is one made in the public interest by someone who has a reasonable belief that:

- a criminal offence;
- 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; or
- concealment of any of the above;

is being, has been, or is likely to be, committed. It is not necessary for the employee to have proof that such an act is being, has been, or is likely to be, committed - a reasonable belief is sufficient. The employee has no responsibility for investigating the matter - it is the Company's responsibility to ensure an investigation takes place.

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An employee who makes such a protected disclosure has the right not to be dismissed, subjected to any other detriment, or victimised, because they have made a disclosure.

3. Key principles

Everyone should be aware of the importance of preventing and eliminating wrongdoing at work. Workers should be watchful for illegal or unethical conduct and report anything of that nature that they become aware of.

The Company is committed to promoting an open and transparent culture where everyone feels comfortable reporting concerns in good faith. Concerns will be investigated thoroughly, promptly, and confidentially. Whistleblowers will be protected against any form of retaliation or victimisation.

If misconduct is discovered as a result of any investigation under this procedure the Company's disciplinary procedure will be used, in addition to any appropriate external measures. Maliciously making a false allegation is a disciplinary offence.

An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager, colleagues should not agree to remain silent and should report the matter to a member of the Leadership Team or HR.

4. Protection and support for whistleblowers

The Company recognises that individuals making disclosures might be concerned about potential repercussions. We are committed to fostering an environment of openness and will support staff who raise reasonable concerns under this policy.

No action will be taken against anyone who makes an allegation with a reasonable belief in its truth, even if the investigation does not ultimately substantiate the claim.

The Company understands the importance of protecting the identity of individuals who raise concerns and every effort will be made to ensure confidentiality and, if requested, all reasonable steps will be taken to protect the anonymity of the whistleblower. However, under certain circumstances to assist with the investigation, or if compelled by law, the individual's identity may become known or need to be revealed. This often depends on the nature of the allegations and the right of the accused to have sufficient information to defend themselves. For instance, allegations of financial misconduct may allow for more anonymity than claims of personal misconduct, such as harassment, which would usually be addressed under a grievance policy. If it becomes necessary to disclose the identity of the whistleblower, wherever possible, this will be discussed with the individual beforehand. An unauthorised breach of confidentiality by those involved in the investigation may be considered a disciplinary offence.

While we encourage open disclosure through our internal procedure for thorough investigations and feedback, we understand some may prefer anonymity and recognise that anonymous reports are better than silence. Concerns can be reported anonymously right

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line. Please note that anonymity may limit our ability to fully investigate and provide updates, and could make it more difficult for individuals to establish whistleblower protection. Anonymous reports will be investigated following the procedures outlined below.

The Company will not tolerate negative behaviour towards an employee who has reported possible wrongdoing. Individuals who feel they have been unfairly treated as a result of reporting a concern under the Whistleblowing Policy should refer to the Grievance Policy.

Victimisation of a worker for raising a qualifying disclosure will be a disciplinary offence.

5. Internal Procedure

This procedure should be used to disclose a concern that, in your honest, reasonable belief, wrongdoing has been committed, is being committed or is likely to be committed.

Examples of wrongdoing include (but are not limited to):

- Serious breach of the Company’s Code of Conduct;
- An unlawful or criminal offence (e.g. fraud, corruption or theft);
- A breach of a legal obligation;
- A disregard of legislation governing health and safety at work;
- Action that has led to or could lead to damage to the environment;
- Breach of the Company’s Anti-bribery and Corruption Policy;
- Behaviour or action that harms, or poses a risk to the welfare of an individual(s);
- Conduct which appears likely to harm the reputation of any of the Company’s businesses;
- The deliberate covering up of information in relation to any of the above.

If an employee is not sure whether to raise a concern under this procedure, they should discuss the issue with an appropriate member of the management team or HR.

Reporting a concern

- An employee who reasonably believes that inappropriate business conduct or activity has occurred, is occurring or is likely to occur should in the first instance raise the issue with a member of the Leadership Team or an HR Manager.
- The employee should advise that they are reporting the matter under the Whistleblowing Policy.

Investigation

- Once an individual has raised a concern, the matter will be investigated by either the person to whom the matter was raised or, where more appropriate, the Company will appoint an alternative manager. It is not the responsibility of the individual raising the concern to investigate the wrongdoing in order to gather evidence.

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- The format of the investigation may vary depending upon the circumstances. However, the individual who raised the concern and other individuals involved may be required to attend an investigation meeting and/or provide a written statement.
- Any investigation will be carried out in accordance with the principles outlined in both the 'Key Principles' and 'Protection and Support for Whistleblowers' sections above.
- Once the investigation is complete, the individual who raised the concern will be informed of the outcome and further steps that are to be taken.
- If the individual who raised the concern is dissatisfied with the investigation or outcome they should raise the matter with the Managing Director.

6. Training and awareness

The Company is committed to ensuring that staff are well-informed about our ethical standards and reporting procedures. Employees will receive guidance on identifying and reporting any issues or concerns. This training supports our commitment to maintaining a transparent and accountable workplace, equipping staff with the knowledge to address and report any wrongdoing confidently.

7. Policy review and contacts

If you have any questions about this policy, your line manager or the HR team can help.

Our policies are reviewed and (if required) updated at least annually and it is everyone's responsibility to keep themselves up to date with the current versions of policies as made available via our intranet.

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