

Whistleblowing Policy & Procedure

Approved by: Guy Wakeley

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Contents

1.	Introduction.....	3
2.	Scope.....	3
3.	Raising a Concern.....	4
4.	Safeguards.....	4

1. Introduction

Reconomy is committed to a free and open culture in dealings between its managers, employees, customers, suppliers, and all people with whom the company engages within business relations.

Reconomy recognises that effective and honest communications are essential to maintain our business values and to ensure that instances of business malpractice are detected and dealt with. This Policy should be referred to when the normal management process has not worked.

Within this Policy, 'Company' refers to all companies within the Reconomy Group.

2. Scope

Whistleblowing is the term used when an employee passes on information relating to wrongdoing. By law, you'll be protected as a whistleblower if you show it is reasonable for you to believe that what you disclose:

1. fits into one of the following categories of a 'qualifying disclosure':
 - financial criminal offences, such as bribery, corruption, money laundering, fraud and tax law.
 - other criminal offences, such as concerning transport safety, protection of privacy and personal data, and security of network and information systems.
 - breach of a legal obligation
 - someone's occupational health and safety is in danger
 - risk or actual damage to the environment
 - suspected modern slavery
2. is in the public interest. Being in the public interest means it affects others (e.g. other employees, customers or the general public). Something is more likely to be in the public interest:
 - the more serious the issue is
 - if you're reporting something that was done deliberately
 - if there are a large number of people affected by the concerns

Personal grievances (e.g. bullying and harassment) are not covered and should be addressed through the Grievance Policy or local equivalent.

The purpose of this Policy is to encourage everyone, whether they are full-time or part-time employees, agency staff, consultants, contractors, suppliers, or customers of Reconomy, to report any possible or actual violations of laws or internal regulations, without risk to themselves.

This Policy will apply in cases where you have information, including reasonable suspicions, about actual or potential breaches, which are occurring, have occurred or are very likely to occur within the company in which you work or in another Reconomy company with which you are/were in contact through your work, and about attempts to conceal such breaches.

If you are uncertain whether something is within scope of this Policy, you should seek advice from your HR or Compliance Department, who can also inform you where you can obtain comprehensive and independent information and advice on procedures and protection available.

3. Raising a Concern

You should refer to your local whistleblowing policies and procedures, developed to address local whistleblowing legislation.

In the event that there are no local whistleblowing policies and procedures in place, you can raise a concern via email to whistleblowing@reconomy.com. Concerns should be raised as soon as possible. Please provide as much detail as possible, including relevant dates, locations, and names.

All reports of concerns falling under this Policy will be acknowledged within 5 working days. Complaints will be investigated promptly, impartially and appropriately in line with approved investigation guidelines. The Company will keep the individual who raised the concern informed of the progress of any investigation and timescale. Any information about the investigation shall be treated as confidential. Determination of findings will be reviewed and appropriate action taken as required.

4. Safeguards

The Company commits to ensuring the confidentiality of the identity of the following persons: (i) the whistleblower, (ii) the persons subject of a report and (iii) other persons named in the report, unless required by law.

The identity of the reporting person is not disclosed to anyone beyond the authorised staff members competent to receive or follow up on reports, without the explicit consent of that person. This protection shall also apply to any other information from which the identity of the reporting person may be directly or indirectly deduced.

Confidentiality protection can be subject to derogation under law, if required for investigations by national authorities or judicial proceedings.

Any processing of personal data carried out pursuant to this Policy, including the exchange or sharing of personal data with the competent authorities, shall be carried out in accordance with Regulation (EU) 2016/679 and with the Company's Data Protection Policy. Personal data which is manifestly not relevant for the handling of a specific report shall not be collected or, if accidentally collected, shall be deleted without undue delay.

Whistleblowers are protected against adverse employment actions (i.e. dismissal, demotion, suspension, harassment or other forms of discrimination) for raising allegations of business misconduct, even if the allegations prove to be incorrect or unsubstantiated, provided the disclosure is made in good faith and where it is believed the information and any allegation in it are true.

Signature:



Name: Guy Wakeley
Position: Chief Executive Officer
Date: 18th June 2025

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