

## 6.4 Group Whistle-Blowing Policy

Senior plc (“Senior”) is committed to maintaining high ethical standards across the Group. As employees and representatives of Senior, we have an obligation to act honestly, with integrity, and to comply with applicable laws. Consequently, employees and other stakeholders are encouraged to report unethical or illegal corporate conduct in accordance with this Policy.

Senior will not tolerate the harassment or victimisation (including the application of informal pressure) of a person reporting corporate misconduct in good faith. In addition to the legal protection provided to such persons, Senior will treat retaliation against a person reporting corporate misconduct as a violation of this Policy and a serious disciplinary offence.

### INTRODUCTION

In the context of this policy, “Whistle-Blowing” refers to the disclosure by a person (the “Whistle-Blower”) of suspected malpractice, illegal acts, omissions or other unethical corporate conduct, including:

- Criminal or negligent behaviour;
- Fraud, bribery or corruption;
- Failure to comply with, or disregard of, the law;
- Improper conduct or unethical behaviour, financial or non-financial maladministration, or the breach of Company policy and procedures or Code of Conduct;
- Damage to the environment;
- A danger to the health and safety of an individual;
- Discrimination based on gender, race, ethnicity, sexual orientation, gender reassignment, marriage and civil partnership, disability, age, pregnancy, religion, veteran status, race, or any other protected legal status; and
- Actions which are intended to conceal any of the above.

This policy is intended to assist individuals who believe they have discovered malpractice or impropriety or have already raised a concern under local grievance, harassment, complaint, disciplinary or other procedures and feel the local investigation was not conducted in accordance with local policy and/or regulations. Individuals are encouraged to first use the designated Whistle-Blowing provider rather than air complaints with any other external third party.

This policy is not designed to question financial or business decisions taken by the Company in the normal course of business. Individuals reporting corporate misconduct under this policy are expected to do so in good faith but reporting allegations known by the Whistle-Blower to be false at the time they were reported may result in disciplinary action.

### PROCEDURE

#### Stage 1

Individuals are encouraged to first raise their concerns, verbally or in writing, with a line manager, a HR team member or local operating business leader. Where local reporting is not appropriate, individuals can report their concerns to a Divisional CEO. Alternatively, anonymous written, electronic or telephonic communications may be submitted to any of the above-named parties. Senior will endeavour to acknowledge receipt of a reported concern within 5 working days.

Where a person feels uncomfortable or unable to approach any of these parties, they should proceed to Stage 2.

This policy encourages individuals to put their name to any disclosures they make to help with the investigation of their concerns but individuals can remain anonymous if desired.

## Stage 2

Where a person feels uncomfortable or unable to approach any of the parties listed in Stage 1, or if the person feels an investigation was not conducted in accordance with local policy or regulations, they should contact Navex Global, who have been nominated by Senior as our third-party Whistle-Blowing service provider. This service is called Ethics Point.

Ethics Point may be contacted by phone or a web-reporting tool. The service includes the ability to report matters in multiple languages.

Contact details and designated languages for Ethics Point are listed below:

<b>Country</b>	<b>Telephone Number</b>
Canada	(844) 823 8002
China	400 120 0157
Czech Republic	(800) 800 142
France	0 800 91 76 38
Germany	0800 001 0299
India	000 800 9191 059
Malaysia	1 800 81 9973
Mexico	800 099 1660
South Africa	080 098 1494
Thailand	1 800 014539
United Kingdom	0800 046 5679
United States of America	(844) 823 8002

Designated languages:

English, Spanish, Thai, French, German, Czech, Hindi, Mandarin and Malay

The Web reporting tool URL available to employees and other stakeholders is:

<http://www.seniorplc.ethicspoint.com>.

Ethics Point will pass the details of the concern raised to a designated individual from Senior based at our Group head office in the UK to allow for a full investigation of the matter. Where requested, Ethics Point will not pass on the personal details of who has made the disclosure if the individual(s) requests that their personal details be withheld.

## Investigations

An investigation will then be carried out under the terms of strict confidentiality to the fullest extent possible, e.g. by not informing the person who the concern is being raised about until it becomes necessary to do so. The Whistle-Blower will also have the option of not having their identity disclosed during the course of the investigation. Where the concerns are not raised on an anonymous basis, an initial interview will normally be arranged with the Whistle-Blower to discuss details of the concern at which time the Whistle-Blower will normally be invited to make a written or verbal statement. Participation in an interview by a Whistle-Blower will not change the protections afforded to the Whistle-Blower by this Policy in any way.

The investigator will ensure that the investigation is undertaken as quickly as possible, without affecting the quality and depth of the investigation, and concluded within the timeframe required by local regulations. If the investigation is prolonged, the investigator will keep the Whistle-Blower informed as to the progress of the investigation.

If there is evidence of criminal activity, then the Company will inform an appropriate law enforcement agency, e.g. police. The Company will ensure that any internal investigation does not interfere with a formal law enforcement investigation.

On conclusion of the investigation, the Whistle-Blower will be informed of the outcome of the investigation and what action Senior has taken, or proposes to take, as a result of the investigation. If no action is to be taken, the reason for this will be explained. If the investigation finds the allegations unsubstantiated and all internal procedures have been exhausted, but the Whistle-Blower is not satisfied with the outcome of the investigation, the Company recognises the lawful rights of employees, ex-employees and other stakeholders to make disclosures to appropriate external, official/regulatory bodies.

Regardless of the outcome of the investigation, Senior will not dismiss, demote, suspend or in any manner discriminate or retaliate against the Whistle-Blower. Senior will treat retaliation against a Whistle-Blower as a violation of this Policy and serious disciplinary offence.

## **DATA PROTECTION**

Individuals raising a concern should be aware that there may be a requirement for their personal data to be transferred within and outside their local region, in accordance with applicable data protection regulations.

## **INVESTIGATORS**

Internal investigators assigned to carry out investigations will be trained employees who are independent of the alleged incident and individuals involved.

## **MONITORING THIS POLICY**

Senior will ensure that the use and effectiveness of this Whistle-Blowing Policy will be monitored and evaluated on a regular basis.