

External Whistleblowing Policy.

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Approved By:	Claire Nelson, Global HR Director
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1. Introduction.

Connect Managed Services (UK) Limited, and its affiliates, trading as Connect ("Connect") are committed to running our business to high ethical and legal standards and want everyone to have an open, transparent and safe place to work. We take all malpractice very seriously, whether it is committed by a colleague, supplier, customer, competitor or contractor.

2. Policy.

2.1 About this policy

- 2.1.1 We are committed to conducting our business with honesty and integrity and we expect all of our stakeholders to maintain high standards. Any suspected wrongdoing should be reported as soon as possible.
- 2.1.2 Connect may at its discretion ask suitably experienced external consultants (e.g. our outsourced HR advisors) to participate in all or part of this policy, including undertaking investigations, meetings, or hearings. Where a consultant acts as Chair in meetings/ hearings etc. that person may make outcome recommendations to Connect, but ultimately Connect will make the decision on whether or not to accept the recommendation.
- 2.1.3 This policy does not form part of any contracts with customers or other third parties and we may amend it at any time.

2.2 What is whistleblowing?

- 2.2.1 Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to our activities. This includes conflicts of interest, bribery, labour standards and modern slavery concerns, facilitation of tax evasion, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment, and any breach of legal or professional obligations.

2.3 How to raise a concern

- 2.3.1 We hope that in many cases you will be able to raise any concerns with your Account Manager, Customer Success Manager, or Service Delivery Manager. However, where you prefer not to raise it with these Connect Employees for any reason, you should make contact using our other Whistleblowing channels. Contact details are at the end of this policy.
- 2.3.2 We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a companion to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

- 2.3.3 Once the initial meeting has taken place, we will investigate your claims and will endeavour to provide you with feedback within 14 days of your initial disclosure. Please note the possibility that such feedback may be a simple confirmation that any investigation is still ongoing.

2.4 Recording a Concern

- 2.4.1 All concerns reported to our whistleblowing channels will be logged and details pertaining to the claim, investigation, and outcome will be kept on file for one year.
- 2.4.2 This will be held by the HR Director in a secure location but will not contain information on who initially reported the concern once the initial investigation has been concluded.

2.5 Confidentiality

- 2.5.1 We hope that anyone will feel able to voice whistleblowing concerns openly under this policy. Completely anonymous disclosures are difficult to investigate. If you want to raise your concern confidentially, we will make every effort to keep your identity secret and only reveal it where necessary to those involved in investigating your concern.

2.6 External disclosures

- 2.6.1 The aim of this policy is to provide a mechanism for reporting, investigating and remedying any wrongdoing in our activities. The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. We strongly encourage you to seek advice before reporting a concern to anyone external. For free, confidential, whistleblowing advice, please contact the charity Protect who operate a confidential helpline. Their contact details are at the end of this policy.

2.7 Protection and support for whistleblowers

- 2.7.1 We aim to encourage openness and will support whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken.
- 2.7.2 Whistleblowers who make whistleblowing reports in a reasonable belief that an issue covered by the applicable legislation has occurred, is occurring or will occur, even if they turn out to be mistaken must not be threatened, retaliated against, harassed, or bullied in any way.
- 2.7.3 For free, confidential, whistleblowing advice, please contact the charity Protect who operate a confidential helpline. Their contact details are at the end of this policy.

3 **Contacts.**

Name	Contact Details
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Internal HR Team	Human.resource@weconnect.tech
Connect Whistleblowing email	Whistleblowing@weconnect.tech
Protect Whistleblowing Charity For free, confidential, whistleblowing advice	https://protect-advice.org.uk/ 020 3117 2520 https://protect-advice.org.uk/contact-protect-advice-line/

4 **Review.**

This Policy shall be reviewed on an annual basis, unless changes to business operations, relevant legislation or codes of practice necessitate an earlier amendment.

5 **Version Control.**

Date	Version	Changes	Reviewer Name & Job Title	Approver Name & Job Title
05.06.2024	v1.0	Initial Version	Emily Irvine, HR coordinator	Claire Nelson, Global HR Director