



Whistleblowing Summary Policy

11 January 2024

Document Title:	Whistleblowing Policy
Description:	Internal policy setting out Accsys' approach to whistleblowing
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1. Policy Statement

- 1.1 Accsys operates a Whistleblowing Policy ("the Whistleblowing Policy" or "the policy"). This Summary Policy ("the Whistleblowing Summary") is a summary of the key provisions of that policy.
- 1.2 Accsys is committed to conducting its business with honesty, integrity, and transparency and in compliance with all legal and regulatory obligations, and expects all staff to maintain the highest standards of ethical business behaviour. 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.

2. Who is Covered by the Policy?

- 2.1 The Whistleblowing Policy applies to all individuals working at all levels within the Group, including the Senior Leadership team, directors, employees (whether permanent, part-time or fixed-term), consultants, trainees and casual/agency staff or any other person working for the Group.

3. What is Whistleblowing?

- 3.1 Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include, but is not limited to, reporting behaviour such as criminal activity, bribery or dangers to health and safety.
- 3.2 A whistleblower is a person who raises a genuine concern in good faith relating to suspected wrongdoing or dangers.

4. Raising a Whistleblowing Concern

- 4.1 Individuals can raise any concerns with their Line Manager.
- 4.2 However, where the matter is more serious, or an individual feels that their Line Manager has not addressed their concern, or they prefer not to raise it with their Line Manager for any reason, an independent whistleblowing hotline is available.
- 4.3 Once the hotline has been notified of the concern, appropriate measures are in place for a suitable person within Accsys to be informed and a decision will then be taken as to who is best placed to investigate and resolve the matter.

5. Confidentiality

- 5.1 It is hoped that all Accsys staff feel able to voice concerns openly in accordance with the Whistleblowing Policy. If an individual who raises a concern wants to do so confidentially, it is possible for their identity to be kept secret and Accsys will make every effort to do this where the individual requests this.
- 5.2 The Company, however, does not encourage individuals to make disclosures anonymously as proper investigation is easiest when the Company is provided with all available information relating to the concern.

6. External Disclosures

- 6.1 As the aim of the Whistleblowing Policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace, individuals reporting concerns should generally not find it necessary to alert anyone externally.
- 6.2 However, in circumstances where the law recognises that it may be appropriate for an individual to report their concerns to an external body such as a regulator, the independent whistleblowing charity, Protect, as well as Huis voor Klokkenluiders (the Dutch whistleblowing authority) operate a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. Their contact details are provided at the end of the Whistleblowing Policy.
- 6.3 Whistleblowing concerns usually relate to an organisation's own staff but they can sometimes relate to the actions of a third party, such as a customer, supplier, service provider, distributor or agent. Individuals are encouraged to report any such concerns internally so they can be investigated.

7. How Are Reported Concerns Dealt With?

- 7.1 Once an individual has raised a concern, the Company will carry out an initial assessment to determine the scope of any investigation and the individual will be informed of the outcome of the assessment.
- 7.2 In some cases an investigator or team of investigators including staff with relevant experience of investigations or specialist knowledge of the subject matter may be appointed. The investigator(s) may make recommendations for change to enable the Company to minimise the risk of future wrongdoing.
- 7.3 The Company will aim to keep the individual who reported the concern informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent the Company providing specific details of the investigation or any disciplinary action taken as a result.
- 7.4 If individuals are not happy with the way in which their concern has been handled, they are encouraged to raise it with any of the following: one of the appropriate nominated persons; the Chair of the Audit Committee; a member of the Board or the Company's external auditors.

8. Protection and Support for Whistleblowers

- 8.1 Individuals must not suffer any detrimental treatment as a result of raising a concern in good faith. If an individual believes that they have suffered any such treatment, they should inform their Line Manager or the whistleblowing hotline immediately, and anyone responsible for the detrimental treatment will be subject to disciplinary action.

9. Responsibility for the Success of the Policy

- 9.1 Accsys' Board of Directors adopted the Whistleblowing Policy on 21 January 2021.

- 9.2 The Audit Committee has overall responsibility for the Whistleblowing Policy, and for reviewing the effectiveness of actions taken in response to concerns raised under the policy.
- 9.3 The Company Secretary has day-to-day operational responsibility for the Whistleblowing Policy, and must ensure that all managers and other staff who may deal with concerns or investigations under the policy receive regular and appropriate training.
- 9.4 All staff are responsible for the success of the policy and should ensure that they use it to disclose any suspected danger or wrongdoing. Staff are invited to comment on the policy and suggest ways in which it might be improved.