

ROMAN[®]

Roman Ltd Whistleblowing Policy

1. Introduction

Employees may, in properly carrying out their duties, have access to, or come into contact with, information of a confidential nature. Their terms and conditions provide that except in the proper performance of their duties, employees are forbidden from disclosing, or making use of in any form whatsoever, such confidential information.

However, the law allows employees to make a 'protected disclosure' of certain information. In order to be 'protected', a disclosure must relate to a specific subject matter (clause 2) and the disclosure must also be made in an appropriate way (clause 3). Whistleblowing protection is confined to a disclosure which, in the reasonable belief of the employee making the disclosure, is made in the public interest.

Roman Ltd ("the Company") is committed to compliance with the Bribery Act 2010. The Company actively encourages a culture of honesty and openness and therefore all employees are required to bring up to their manager or other designated person any issue that, in the employee's opinion, might constitute bribery or corruption

2. Purpose

The purpose of this Whistleblowing Policy is to provide a framework for employees and other stakeholders to report their concerns about illegal, unethical, or inappropriate behavior within Roman Ltd without fear of retaliation.

3. Scope

This policy applies to all employees, contractors, suppliers, and other stakeholders associated with Roman Ltd.

4. Definitions

- **Whistleblower:** Any person who reports misconduct or raises a concern about illegal, unethical, or inappropriate behavior.
- **Protected Disclosure:** A report made in good faith about misconduct or concerns within the scope of this policy.

5. Policy Statement

Roman Ltd is committed to maintaining the highest standards of integrity and accountability. We encourage the reporting of any misconduct, including but not limited to:

- Fraud
- Corruption
- Financial Irregularities

- Criminal Activities
- Health and Safety Violations
- Environmental Damage
- Violation of company policies or ethical standards
- Any other illegal or unethical conduct

6. Specific Subject Matter

If, in the course of employment, an employee becomes aware of information which they reasonably believe tends to show one or more of the following:

- 6.1 That a criminal offence has been committed, is being committed or is likely to be committed.
- 6.2 That a person has failed, is failing or is likely to fail to comply with any legal obligation to which he is subject.
- 6.3 That a person has failed, is failing or is likely to fail to comply with any legal obligation to which he is subject.
- 6.4 That a miscarriage of justice that has occurred, is occurring, or is likely to occur.
- 6.5 That the health or safety of any individual has been, is being, or is likely to be, endangered.
- 6.6 That the environment, has been, is being, or is likely to be, damaged.
- 6.7 That information tending to show any of the above, is being, or is likely to be, deliberately concealed.
- 6.8 That the business or any associated person has been, is being, or is likely to be receiving or offering bribes.

they must use the Company's reporting procedure as set out below.

7 Reporting Procedure

7.1 Reporting Channels: Concerns can be reported through multiple channels:

- **Internal Suggestion Box:** Suggestion boxes are located across multiple departments on site. Confidential reports can be submitted by completing the Whistleblowing report form and posting the form to the secured box. HR / Senior management will be granted access for the purpose of review and feedback for documentation received.
- **External Email:** <https://protect-advice.org.uk/contact-protect-advice-line/>

Protect Advice.org, previously known as Public Concern at work, is a UK-based charity focused on promoting and protecting whistleblowing. It provides free, confidential advice to employees and other stakeholders who are concerned about wrongdoing in the workplace. The organization aims to ensure that individuals feel safe to raise concerns about malpractice without fear of retaliation.

7.1.1 Failure to follow this procedure may result in the disclosure of information losing its 'protected status.'

7.1.2 For further guidance in relation to this matter or concerning the use of the disclosure procedure generally, employees should speak in confidence to the HR Department.

7.2 Confidentiality

7.2.1 All reports will be treated with the utmost confidentiality. The identity of the whistleblower will not be disclosed without their consent, unless required by law.

7.3 Anonymous Reporting

7.3.1 Reports can be made anonymously. However, providing contact information may facilitate the investigation process.

7.4 Handling of Reports

7.4.1 **Initial Assessment:** All reports will be reviewed by the designated Compliance Officer to determine the appropriate course of action.

7.4.2 **Investigation:** A thorough impartial investigation will be conducted for all reports that warrant further examination. The investigation may involve interviews, document reviews, and collaborations with external experts if necessary.

7.4.3 **Outcome:** The outcome of the investigation will be documented. Appropriate actions will be taken based on the findings, which may include disciplinary measures, policy changes, or reporting to relevant authorities.

8 Protection Against Retaliation

8.1 **Non-retaliation:** Roman Ltd strictly prohibits retaliation against any whistleblower who reports concerns in good faith. Retaliatory actions, such as termination, demotion, harassment, or any other form of discrimination, will not be tolerated.

8.2 **Support and Assistance:** Whistleblowers who experience retaliation should report it immediately. Roman Ltd will take appropriate measures to protect and support the whistleblower.

9 False Reporting

9.1 Reports made with malicious intent or knowingly false information are not protected by this policy. Disciplinary action may be taken against individuals who make false reports.

10 Responsibility and Accountability

- **Management:** Managers and supervisors are responsible for promoting a culture of openness and integrity. They must ensure that employees are aware of this policy and encourage the reporting of concerns.
- **Compliance Officer:** The Compliance Officer is responsible for overseeing the implementation of this policy, handling reports, and ensuring proper investigation and follow up.
- **Employees:** All employees are expected to adhere to this policy and report any misconduct or concerns.

11 Review and Monitoring

This policy will be reviewed annually or as necessary to ensure its effectiveness and compliance with legal and regulatory requirements. Feedback from employees and stakeholders will be considered in the review process.

12 Communication

This Whistleblowing Policy will be communicated to all employees, contractors, suppliers and other stakeholders. The policy will be available on the company "U" Drive.