

BYTES TECHNOLOGY GROUP PLC

(Incorporated in England and Wales)
Registered number: 12935776

SPEAK-UP POLICY

1. POLICY STATEMENT

- 1.1** We are committed to conducting our business with honesty and integrity, and we expect all staff to maintain high standards. However, all organisations face the risk of things going wrong from time to time. A culture of openness and accountability is essential in order to prevent wrongdoing occurring and to address it if it does occur.
- 1.2** The aims of this policy are:
- 1.2.1** to encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected;
 - 1.2.2** to provide staff with guidance as to how to raise those concerns;
 - 1.2.3** to reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.
- 1.3** This policy does not form part of any employee's contract of employment and it may be amended at any time.

2. WHO IS COVERED BY THIS POLICY?

This policy applies to all individuals working at all levels of the organisation, including senior managers, officers, directors, employees, consultants, contractors, homeworkers, part-time and fixed-term workers, casual and agency staff (collectively referred to as staff in this policy).

3. WHAT IS SPEAKING UP?

- 3.1** Speaking up or whistleblowing is the disclosure of information that relates to suspected wrongdoing or dangers at work. This may include criminal activity; miscarriages of justice; danger to health and safety; damage to the environment; failure to comply with any legal obligation; bribery; negligence; breach of our internal policies and procedures; or the deliberate concealment of any of these matters.

- 3.2** A whistleblower is a person who raises a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or negligence affecting any of our activities you should report it under this policy.
- 3.3** This policy should not be used for complaints relating to your personal circumstances, such as the way you have been treated at work. In those cases, you should use the Grievance Procedure.
- 3.4** If you are uncertain whether something is within the scope of this policy you should seek advice from the Whistleblowing Officers, whose contact details are at the end of this policy.

4. RAISING A WHISTLEBLOWING CONCERN

- 4.1** We hope that in many cases you will be able to raise any concerns with your line manager or the Human Resources department. You may tell them in person or put the matter in writing if you prefer. They may be able to agree on a way of resolving your concern quickly and effectively. In some cases, they may refer the matter to one of the Whistleblowing Officers.
- 4.2** However, where the matter is more serious, or you feel that your line manager or the Human Resources department has not addressed your concern, or you prefer not to raise it with them for any reason, you should contact a Whistleblowing Officer.

5. CONFIDENTIALITY

- 5.1** We hope that staff will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concern confidentially, you have the option to do so and we will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss it with you.
- 5.2** Should disclosures be made anonymously, this may result in investigations being more difficult or impossible if we cannot obtain further information from you. Whistleblowers who are concerned about possible reprisals if their identity is revealed can come forward to a Whistleblowing Officer and appropriate measures can then be taken to preserve confidentiality. If you are in any doubt you can seek advice from Protect, the independent whistleblowing charity, who offer a confidential helpline. Their contact details are at the end of this policy.

6. EXTERNAL DISCLOSURES

- 6.1** The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases, you should not find it necessary to alert anyone externally.
- 6.2** 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. It will very rarely if ever be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Protect, operates a confidential helpline. They also have a list of prescribed

regulators for reporting certain types of concern. Alternatively, you can make your disclosure anonymously through an independent third party, Navex EthicsPoint Incident Management. Contact details are at the end of this policy.

- 6.3** Whistleblowing concerns usually relate to the conduct of our staff, but they may sometimes relate to the actions of a third party, such as a customer or supplier or service provider. The law allows you to raise a concern with a third party, where you reasonably believe it relates mainly to their actions or something that is legally their responsibility. However, we encourage you to report such concerns internally first. You should contact your line manager or the Human Resources department or one of the other individuals set out in paragraph 4 for guidance.

7. INVESTIGATION AND OUTCOME

- 7.1** We will provide you with an opportunity to discuss your concern with us as soon as possible, should you wish to do so. You may bring a colleague or union representative to any meetings under this policy. Your companion will be required to respect the confidentiality of your disclosure and any subsequent investigation.
- 7.2** Following this meeting, we will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment. Depending on the complexity of the matter, you may be requested to provide further information to assist in reaching a suitable outcome..
- 7.3** In some cases we may appoint an investigator or team of investigators including staff with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.
- 7.4** We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.
- 7.5** If we conclude that a member of staff has raised a concern under this procedure maliciously, or without having any reasonable grounds for doing so, action may be taken against the member of staff under the disciplinary procedure. In extreme cases, this could result in dismissal.

8. IF YOU ARE NOT SATISFIED

- 8.1** While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy you can help us to achieve this.
- 8.2** If you are not satisfied with the way in which your concern has been handled, you can raise it with the other key contact in paragraph 4. Contact details are set out at the end of this policy.

9. PROTECTION AND SUPPORT FOR WHISTLEBLOWERS

- 9.1 It is understandable that whistleblowers may at times be concerned about possible repercussions. We aim to encourage openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken.
- 9.2 Staff must not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform a Whistleblowing Officer immediately. If the matter is not remedied you should raise it formally using our Grievance Procedure.
- 9.3 Staff must not threaten or retaliate against whistleblowers in any way. Anyone involved in such conduct will be subject to disciplinary action.

10. RESPONSIBILITY FOR THE SUCCESS OF THIS POLICY

- 10.1 The Board has overall responsibility for this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.
- 10.2 The Whistleblowing Officers have day-to-day operational responsibility for this policy, and must ensure that all managers and other staff who may deal with concerns or investigations under this policy receive regular and appropriate training.
- 10.3 The Whistleblowing Officers, in conjunction with the Board should review this policy from a legal and operational perspective at least once a year.
- 10.4 All staff are responsible for the success of this policy and should ensure that they use it to disclose any suspected wrongdoing. Staff are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Whistleblowing Officers.

Contact details

Whistleblowing Officers	<p>Tina Sexton Bytes Software Services: Finance Director Tina.Sexton@bytes.co.uk</p> <p>Peter Goodrick Phoenix Software: Finance Director Peter-Goodrick@phoenixs.co.uk</p>
Chair of the board of directors	<p>Patrick De Smedt Per: WK Groenewald (Group Company Secretary) WK.Groenewald@bytesplc.com</p>

<p>Navex EthicsPoint Incident Management (Independent reporting web portal and freephone hotline)</p>	<p>Bytes Software Services Web: https://bytes.ethicspoint.com Mobile URL: https://bytes.navexone.eu</p> <p>Mobile QR code :</p>  <p>Phone: 0808 234 7287</p> <p>Phoenix Software Web: https://phoenixs.ethicspoint.com Mobile URL: https://phoenixsmobile.ethicspoint.com</p> <p>Mobile QR code :</p>  <p>Phone: 0808 234 7287</p>
<p>Protect (Independent External party providing whistleblowing guidance)</p>	<p>Helpline: 0203 117 2520 E-mail: whistle@protect-advice.org.uk Website: www.protect-advice.org.uk</p>

Last reviewed effective 1 March 2025.