

XYNTEO WHISTLEBLOWING POLICY & PROCEDURE

June 2025



1. ABOUT THIS POLICY

- 1.1. Xynteo Limited and its Affiliates¹ ("Xynteo" or "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 such situations occurring and to address them when they do occur. Any suspected wrongdoing should be reported as soon as possible.
- 1.2. The purpose of this policy is:
- a. 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.
 - b. To provide staff with guidance as to how to raise those concerns.
 - c. 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 covers:
- a. all employees, officers, consultants, contractors, volunteers, interns, casual workers, agency workers ("Xynteo Personnel"); and
 - b. any other stakeholder requiring protection from retaliation as part of our feedback policy (available [here](#)).
- 1.4. This policy does not form part of any employee's contract of employment.
- 1.5. We reserve the right to amend this policy at any time.

¹ Affiliates means Xynteo AS, Xynteo AB, Xynteo India Private Limited, Xynteo Nordic AS, and Xynteo INC

2. WHAT IS WHISTLEBLOWING?

- 2.1. Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to the Company's activities. This includes but is not limited to bribery, 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.
- 2.2. 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 danger affecting any of our activities, you should report it under this policy.
- 2.3. In respect of Xynteo Personnel, this policy should not be used for complaints relating to your own personal or professional circumstances, such as the way you have been treated at work. In those cases, you should use Xynteo's internal procedure and feedback channels such as the employee survey or contacting your people team/line manager directly

3. HOW TO RAISE A CONCERN

- 3.1. In respect of Xynteo Personnel:

We hope that in many cases you will be able to raise any concerns with your manager. You may tell them in person or put the matter in writing if you prefer. They may be able to agree a way of resolving your concern quickly and effectively. In some cases, they may refer the matter to your line manager, and you also have the option to raise your concern with this person directly

Where you prefer not to raise it with your manager for any reason, or you feel your manager has not addressed your concern, you should contact the Melissa Page, Director of People and Business Operations. Contact details are at the end of this policy.

If your submission is not anonymous, we will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

- 3.2. In respect of any other stakeholder:

We are committed to maintaining integrity, transparency, and accountability. If you are an external stakeholder and have a serious concern about suspected wrongdoing, unethical behaviour, or a breach of our policies, we encourage you to report it. Your concerns help us uphold our values and continuously improve. You can report your concerns through our [feedback process available here](#) or through our ethics email at whistleblowing@xynteo.com.

4. CONFIDENTIALITY

- 4.1. If you wish, you can raise your concern without providing your name or any identifying details. We provide channels that allow for anonymity, including an online form or you may wish to contact us using a depersonalised email address.
- 4.2. If you choose to disclose your identity, we will take measures to keep your details confidential and only share them with those who need to know to investigate the concern. If it becomes necessary for your identity to be disclosed (for example, to progress an investigation or as required by law), we will inform you first.
- 4.3. We hope that Xynteo Personnel and external stakeholders will feel able to voice whistleblowing concerns openly under this policy. While we will have mechanisms in place to provide the protections you require, completely anonymous disclosures may limit our ability to investigate your concerns fully or provide you with feedback on the outcome.
- 4.4. If you need further guidance on how best to raise your concerns, 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.

5. EXTERNAL DISCLOSURES

- 5.1. The aim of this policy is to provide a mechanism for reporting, investigating and remedying any wrongdoing at Xynteo. In most cases you should not find it necessary to alert anyone externally.
- 5.2. However, 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 encourage you to seek advice before reporting a concern to anyone external. Protect operates a confidential helpline, and as mentioned, their contact details are set out at the end of this policy.

6. PROTECTION AND SUPPORT FOR WHISTLEBLOWERS

- 6.1. It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken.
- 6.2. Whistleblowers must not suffer any detrimental treatment as a result of raising a genuine concern. Detrimental treatment includes dismissal, disciplinary action, threats, unfavourable treatment or other reputational issues connected with raising a concern. If you believe that you have suffered any such treatment, you should contact Melissa Page, Director of People and Business Operations immediately.

Xynteo Personnel must not threaten or retaliate against whistleblowers in any way. Employees involved in such conduct may be subject to disciplinary action.

- 6.3. However, if we conclude that a Xynteo Personnel whistleblower has made false allegations maliciously, the individual concerned may be subject to disciplinary action, suspension, demotion or removal from position.
- 6.4. Other consequences may include terminating our agreements with third parties and suppliers, or other legal action.
- 6.5. We take all reports of retaliation seriously and will act in accordance with our values and legal obligations to ensure a safe and open environment for speaking up
- 6.6. Protect operates a confidential helpline. Their contact details are at the end of this policy.

7. CONTACTS

Xynteo Whistleblowing Officer

Melissa Page

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mep@xynteo.com

Protect (Independent whistleblowing charity)

Helpline: 0203 117 2520

Website: www.pcaw.co.uk