

TelecomPlus

Whistleblowing policy

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The Company and the Board of Directors are committed to conducting our business with honesty and integrity, and to fulfil all our responsibilities to our customers, employees, shareholders and the wider community. We expect all staff to maintain these same standards. 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, or to address them when they do.

1 The aims of this policy

- to encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated appropriately, and that their confidentiality will be respected;
- to provide staff with guidance as to how to raise these concerns; and
- to reassure staff that they should be able to raise genuine concerns in good faith without fear of reprisals, even if they turn out to be mistaken.

2 Who does this policy apply to?

This policy applies to all Telecom Plus and our subsidiaries employees, fixed contract or permanent. It also applies to partners, contractors, consultants and agency staff.

3 What is whistleblowing?

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:

- criminal activity;
- miscarriages of justice;
- danger to someone's health or safety;
- damage to the environment;
- failure to comply with any legal obligation or regulatory requirements;
- bribery;
- financial fraud or mismanagement;
- negligence;
- unauthorised disclosure of confidential information; or
- you believe someone is covering up wrongdoing or deliberately concealing of any of the above matters.

There are certain types of complaints that do not count as whistleblowing. These are personal grievances (for example bullying, harassment or discrimination) unless your particular case is in relation to reporting any of the above.

4 Who is a whistleblower?

A Whistleblower is a person who raises a genuine concern in good faith relating to any of the above.

Employees who whistleblow have certain protections under the Public Interest Disclosure Act 1998. This includes the right not to be dismissed or suffer any detriment at work as a result of making a 'protected disclosure'.

As an employee, you are protected by UK law from suffering any detrimental treatment as a result of raising a concern in good faith. 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

your Line Manager & the Director of People and Culture at Utility Warehouse Limited. If the matter is not remedied, you should raise it formally using the Company's Grievance Procedure.

Members of staff must not threaten or retaliate against whistleblowers in any way. Anyone involved in such conduct will be subject to disciplinary action.

Members of staff are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing.

5 Our commitment

You can raise your concern at any time about an incident that happened in the past, is happening now, or you believe will happen in the near future. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of the Company's activities you should report it under this policy.

6 Raising the concern

We hope that in the first instance, you will be able to voice your concerns with your line manager or director.

If you do not feel able to talk to your line manager, you can tell:

- the People & Culture Director
- the Legal & Compliance Director
- the Company Secretary

However, if you feel your concerns have not been addressed appropriately and or you want to raise your concern confidentially we have an external confidential hotline you could use. The service is provided by an independent company called Safecall. This service allows you to report by telephone and web and this can be used by anyone on an anonymous basis.

The confidential telephone number to ring is:

Freephone: **0800 915 1571**

Online: <http://www.safecall.co.uk/report>

7 How we handle the concern

Once you have raised a concern the matter will be investigated and you will be informed of the findings. You may be required to attend meetings in order to provide further information. 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.

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 from 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.

If we conclude that a whistleblower has made false allegations maliciously, in bad faith or with a view to personal gain, the whistleblower will be subject to disciplinary action.

8 Should you wish to take the matter further?

We hope you will be satisfied that the policy provides an appropriate way of dealing with your concerns. If you are not satisfied with the process, you may take the matter to outside bodies such as the regulators or the police.

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