

Whistleblowing

1.0 Policy

1.1. Our Commitment

At the Positive Change Group, we are dedicated to conducting business with the highest integrity and honesty and expect the same from everyone who works with us. We encourage all employees to report any concerns about wrongdoing or unethical behaviour within the organisation (which may include by the business, its employees, contractors or agents) that fall short of these principles.

We understand that raising concerns can be difficult, especially if the issue involves the business itself. This policy ensures you can report concerns confidently and safely, knowing they will be taken seriously, and that you will be protected from any retaliation.

Whistleblowing is legally protected, and the Positive Change Group is committed to upholding these protections.

1.2. Definitions and Scope

The Positive Change Group is committed to creating a safe, open and transparent workplace culture, where employees are encouraged to raise concerns at the earliest opportunity.

The Positive Change Group recognises that employees are often the first to realise that there may be something seriously wrong within an organisation. All employees are encouraged to use the procedure set out below if they have a concern that falls within the definition of a qualifying disclosure.

Certain disclosures are prescribed by law as “qualifying disclosures”. A “qualifying disclosure” means a disclosure of information that the employee genuinely and reasonably believes is in the public interest and shows that the Company has committed a “relevant failure” by:

- committing a criminal offence;
- failing to comply with a legal obligation;
- a miscarriage of justice;
- endangering the health and safety of an individual;
- environmental damage; or
- concealing any information relating to the above.

These acts can be in the past, present, or future - for example, a disclosure qualifies if it relates to environmental damage that has happened, is happening, or is likely to happen. The Positive Change Group and any of its subsidiaries will take any concerns that you may raise relating to the above matters very seriously.

The Employment Rights Act 1996 (United Kingdom) provides protection for workers who ‘blow the whistle’ where they reasonably believe that some form of illegality, injustice or breach of health and safety has occurred or is likely to occur. The disclosure has to be “in the public interest”. We encourage you to use the procedure to raise any such concerns.

If you wish to raise a concern that does not fall into the whistleblowing category, you can raise a grievance. Employees can find the policy and procedure on the People and Culture section of the intranet.

1.3. Treatment by Others

The Positive Change Group understands that it can be hard for employees to speak up, especially if they worry about retaliation. We do not tolerate bullying, harassment, or any unfair treatment of anyone who raises a qualifying disclosure.

Speaking up will not affect your job, promotion, or training opportunities. Any such behaviour is a serious breach of our values as an organisation and, if upheld following investigation, will be subject to disciplinary action potentially leading to dismissal.

If an employee makes an allegation in good faith, but the allegation is not confirmed by the investigation, no action will be taken against that member of staff provided the member of staff is acting honestly. It does not matter if they are mistaken or if there is an innocent explanation for their concerns.

1.4. Roles and Responsibilities

The Positive Change Group Board are responsible and accountable for this Whistleblowing Policy and Procedure.

The Positive Change Group Board will:

- demonstrate commitment to developing an open culture within the organisation, through actions and strategy
- receive and review annual reports on whistleblowing activity

Line managers are responsible for:

- ensuring all staff are aware of this policy and procedure and their responsibilities
- escalating issues and engaging the support of our designated officer where required

The People & Culture Team are responsible for:

- investigating issues raised promptly and thoroughly
- fostering an open culture within their teams
- ensuring any whistleblower is not subject to detriment

All employees have a duty to report wrongdoing (whistleblowing) under the circumstances set out in section 1.2 of this policy.

2.0 Procedure

2.1. The Reporting Procedure

If an employee is making a qualifying disclosure under this policy, they should report any concerns to the Whistleblowing Officer who will treat the matter with complete confidence. You need to advise the Whistleblowing Officer that you are reporting the concerns under the Whistleblowing Policy at time of reporting.

If you do not report your concerns to the Whistleblowing Officer or alternative methods (jurisdiction specific) you should take them direct to the appropriate organisation or body.

UK Employees

Employees in the UK have access to an additional Whistleblowing method through Health Hero, an external provider. You can report any concerns you may have through HealthHero's secure Whistleblowing service by calling the 24-hour confidential helpline. A trained HealthHero advisor will then pass on the details of your concerns to the Positive Change Group's Whistleblowing Officer. You can request updates on the process through the HealthHero service anonymously or speak with the Whistleblowing Officer if you wish to no longer remain anonymous. If you are not satisfied with the explanation or reason given to you, you should raise the matter with the appropriate official organisation or regulatory body.

Singapore Employees

Employees in Singapore have access to an additional Whistleblowing method through the WSG service. Confidentiality of the whistle-blower's identity will be maintained to the extent possible and in accordance with local legal requirements. Anonymous reports are accepted, but full investigations depend on the completeness of the information provided.

Reports, preferably with supporting documents, may be submitted via:

- **Email:** whistleblow@wsg.gov.sg
- **Mail:** Internal Audit Unit, Workforce Singapore Agency,
1 Paya Lebar Link, #08-08 PLQ 2, Paya Lebar Quarter, Singapore 408533
- **Phone:** +656328 1877

Information to Include (where possible):

- Whistleblower's name and contact details
- Details of individuals or companies involved
- Relationship to reported parties
- Description of the incident (date, time, location, actions, duration)
- Names of any WSG staff already notified
- Supporting evidence or documentation

2.2. How The Positive Change Group will Respond

Any qualifying disclosure made under this policy will be investigated thoroughly, promptly and confidentially. The member of staff's identity will not be disclosed without their prior consent. All members of staff will be treated with respect at all times.

When an individual makes a disclosure to our designated officer, the organisation will process any personal data collected as part of the investigation in line with the Positive Change Group's data protection policy data protection policy, ensuring the data is stored securely and only accessed by those individuals essential for dealing with the disclosure.

Once a concern has been raised, the Whistleblowing Officer will write to the employee setting out the following:

- Acknowledgement that the concern has been received,
- Confirmation of the date the concern it was received and a summary of the concern
- Whether the person who raised the concern has requested confidentiality,
- Indicating how the matter will be dealt with and by whom and how they can be contacted
- Advising how long to expect the investigation to take
- Telling the member of staff when an investigation has or is to be started and if further assistance will be needed from them.

In the event that employees raise the issue through the external provider and wishes to remain confidential, the Whistleblowing Officer will provide this information to the third-party who can pass it on to the complainant.

The member of staff who raises the concern will be kept up to date with its progress.

Investigation Procedures

The investigation will be objective and evidence-based and will produce a report that focuses on identifying and rectifying any issues and learning lessons to prevent problems recurring. The investigator may decide that the concern would be

better looked at under another process, such as the grievance procedure. If so, this will be discussed with the member of staff.

On conclusion of any investigation, the member of staff will be told the outcome of the investigation and what the Positive Change Group has done, or proposes to do, about it. Wherever possible, the Positive Change Group will share the full investigation report with the member of staff who raised the concern (while respecting the confidentiality of others). If no action is to be taken, the reason for this will be explained. If you are not satisfied with the explanation or reason given to you, you should raise the matter with the appropriate official organisation or regulatory body. If the member of staff has reported this through the HealthHero Whistleblowing Service, they will be able to call to request updates and the final conclusion of any investigation.

Data Protection

When an individual makes a disclosure to our designated officer, the organisation will process any personal data collected as part of the investigation in line with the Positive Change Group's data protection policy data protection policy, ensuring the data is stored securely and only accessed by those individuals essential for dealing with the disclosure.

3.0 Review and revision

We aim to review our policies on an annual basis, or more frequently if needed. Documentation will be updated to reflect any changes in company needs, best practice, and in accordance with local law. All updated documentation/policies will be uploaded to replace the previous version. For any questions, employees are encouraged to visit our intranet or email the People and Culture team.

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