

19 February 2025



## **Whistleblowing Policy**

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This document articulates operational and performance guidance for Yellow Cake plc employees, officers, self-employed contractors, consultants, casual workers, agency workers, volunteers and interns.



## Yellow Cake plc Whistleblowing Policy

### 1 INTRODUCTION

Yellow Cake plc (“**Yellow Cake**”, the “**Company**” or “**we**”) is committed to the highest possible standards of accountability, honesty and openness. The Company therefore encourages all staff to maintain high standards in their work and to report any wrongdoing which falls short of these standards. All staff should feel assured that they are able to raise concerns about malpractice without fear of reprisals and that the issues they raise will be taken seriously and dealt with confidentially. No employee should feel at a disadvantage in raising legitimate concerns.

This policy is intended to assist the Company’s personnel (whether full-time or part-time) and contractors who believe they have discovered malpractice or impropriety.

This policy applies to all employees, officers, consultants, self-employed contractors, casual workers, agency workers, volunteers and interns.

This policy does not form part of any contract of employment or any other contract to provide services, and we may amend it at any time.

Our board of directors (the “**Board**”) has overall responsibility for the effective operation of this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy. The Chief Executive Officer and the Chief Financial Officer have day-to-day operational responsibility for this policy and you should refer any questions about this policy to them in the first instance.

### 2 SCOPE OF POLICY

**2.1** Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. The Company encourages you to raise any serious concerns you may reasonably hold or when you reasonably believe:

- that a criminal offence of any kind has been committed, is being committed, or is likely to be committed;
- that a person has failed, is failing or is likely to fail to comply with any substantial legal or personal obligation to which he/she is subject;
- that a miscarriage of justice has occurred, is occurring, or is likely to occur;
- that the health and safety of any individual has been, is being, or is likely to be endangered;
- that the environment has been, is being or is likely to be damaged; or
- that information that would relate to any one of the preceding situations has been or is likely to be deliberately concealed.

**2.2** If your concern is related to money laundering, please refer to our Anti-Money Laundering, Anti-Bribery and Corruption Policy.



### **3 SAFEGUARDS**

#### **3.1 Protection**

A whistleblower is a person who raises a genuine concern in the reasonable belief that serious misconduct is involved, relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a whistleblowing concern), you should report it under this Policy.

This Policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases, you should use the Grievance Procedure.

#### **3.2 Confidentiality and Anonymous Allegations**

The Company encourages employees to put their name to any disclosures, as concerns expressed anonymously may be more difficult to properly investigate and it may be more difficult to establish whether any allegations are credible. However, disclosures made in accordance with this Policy will be treated sensitively. If you approach the Company as a whistleblower, you will be protected in accordance with relevant legislation and, as far as is consistent with applicable local law, your identity will be kept confidential where that does not frustrate or hinder investigations. Subject to any legal requirements, the Company will take all reasonable steps to ensure that your identity is known only by those carrying out the investigation into the concerns raised by you. The principle of maintaining confidentiality will also be applied to the identity of any individual who may be the subject of a complaint/disclosure.

### **4 PROCEDURES FOR MAKING A DISCLOSURE**

If you raise a concern in accordance with this Policy, in the reasonable belief that serious misconduct is involved, your concern will be taken seriously by the Company.

Any complaint must be made to a Director or line manager who will then treat the matter in confidence and will arrange a meeting with you as soon as possible to discuss your concern.

We will carry out an initial assessment to determine the scope of any investigation. You may be required to attend additional meetings in order to provide further information. We will aim to keep you informed of the progress of the investigation. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation, an outcome or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

### **5 TIMESCALES**

Due to the varied nature of these sorts of complaints, which may involve internal investigators and/or law enforcement authorities, it is not possible to lay down precise timescales for such investigations. Investigations will be undertaken as quickly as possible.

### **6 IF YOU ARE NOT SATISFIED**

While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way.



If you are not happy with the way in which your concern has been handled you can raise it with the Chair of the Board or the Chair of the Audit Committee.

## **7 EXTERNAL DISCLOSURES**

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.

The law recognises that in some circumstances it may be appropriate for you, or you may have the right in your jurisdiction, 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. In the UK, the independent whistleblowing charity, *Protect*, operates a confidential helpline. For details visit [www.protect-advice.org.uk](http://www.protect-advice.org.uk).

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 client, 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.

Before raising concerns externally, it would be advisable for you to take independent legal advice about whether you can be legally protected against victimisation and dismissal and whether the disclosure of information would give rise to any breaches of any confidentiality obligations owed to the Company, a client or any third party and/or constitute an offence under other legislation.

## **8 PROTECTION AND SUPPORT FOR WHISTLEBLOWERS**

Staff who raise a genuine concern under this Policy, in the reasonable belief that serious misconduct is involved, should not be dismissed or subjected to any detriment as a result of their disclosure. Detriment includes unwarranted disciplinary action, victimisation or threats. If you believe you have been subjected to a detriment you should tell a Director immediately, if the problem is not resolved then you should raise a grievance in accordance with the Company's Grievance Procedure.

The Company will take all reasonable steps to ensure that you do not suffer any victimisation as a result of having raised such a concern and will take disciplinary or other appropriate action against any individual under the Company's control found to have carried out an act of victimisation. Any worker who retaliates against a whistleblower will be subject to disciplinary action.

While the Company encourages you to raise any concerns you may have where you reasonably believe there has been serious misconduct, the Company will take disciplinary or other appropriate action against any individual who abuses this Policy by deliberately raising false and/or malicious allegations.



## 9 CONTACTS

<b>Public Concern at Work</b> <b>(Independent whistleblowing charity)</b>	Helpline: (020) 7404 6609 E-mail: <a href="mailto:whistle@pcaw.co.uk">whistle@pcaw.co.uk</a> Website: <a href="http://www.pcaw.co.uk">www.pcaw.co.uk</a>
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