

1. ABOUT THIS POLICY

- 1.1 We are committed to conducting our business with honesty and integrity and we expect all staff to maintain high standards. Any suspected wrongdoing should be reported as soon as possible.
- 1.2 This policy covers all employees, officers, consultants and contractors.
- 1.3 This policy does not form part of any employee's contract of employment and we may amend it at any time.

2. WHAT IS WHISTLEBLOWING?

- 2.1 Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to our activities. This includes 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.

3. HOW TO RAISE A CONCERN

- 3.1 We hope that in many cases you will be able to raise any concerns with your manager. However, where you prefer not to raise it with your manager for any reason, you should contact the Managing Director. Contact details are at the end of this policy.
- 3.2 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.

4. CONFIDENTIALITY

- 4.1 We hope that staff will feel able to voice whistleblowing concerns openly under this policy. Completely anonymous disclosures are difficult to investigate. If you want to raise your concern confidentially, we will make every effort to keep your identity secret and only reveal it where necessary to those involved in investigating your concern.

5. EXTERNAL DISCLOSURES

- 5.1 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.
- 5.2 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. We strongly encourage you to seek advice before reporting a concern to anyone external. Protect operates a confidential helpline. Their contact details are at the end of this policy.

6. PROTECTION AND SUPPORT FOR WHISTLEBLOWERS

- 6.1 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. If you believe that you have suffered any such treatment, you should

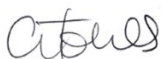
inform the Managing Director immediately. If the matter is not remedied you should raise it formally using our Grievance Procedure.

- 6.3 You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct you may be subject to disciplinary action. [In some cases the whistleblower could have a right to sue you personally for compensation in an employment tribunal.
- 6.4 However, if we conclude that a whistleblower has made false allegations maliciously, the whistleblower may be subject to disciplinary action.
- 6.5 **Protect**, an independent Whistleblowing Charity operates a confidential helpline. See their contact details below.
- 6.6 **setec Group** as the parent company also operates professional alert mechanism, which is intended to allow all Employees to be involved in preventing the risks of corruption. All Employees may also send their alert to the setec Ethics Committee via. contact details below.

7. CONTACTS

Whistleblowing Officer	Ms Sarah Jane TOMPKINSON +44 7946 125578 sarah-jane.tompkinson@setec.com
Managing Director	Mr Grant Jones +44 7956 313846 grant.jones@setec.com
Protect (Independent whistleblowing charity)	Helpline: 0203 117 2520 E-mail: whistle@pcaw.co.uk Website: www.pcaw.co.uk
Ethics Committee of the setec Group	E-mail: alert.ethics@setec.com Postal Address, by sealed Envelope marked "Confidential": SETEC CONSULTANTS Ethics Committee of the setec Group Immeuble Central Seine, 42-52 Quai de la Rapée, 75583 Paris cedex 12

Signed



Grant Jones

Managing Director, SCEL

Date: 07/04/2025

Next Review Date: 07/04/2026