



## INTRODUCTION

Smar-Technology Ltd is committed to operating ethically and with integrity in all things we do. That is why it is vital we do the right thing by our employees, clients and the communities in which we work, and we operate in compliance with all applicable laws.

This Whistleblower Policy has been developed to help you understand our approach to Whistleblowing and the expectations we have for all employees at Smar-Technology Ltd. It forms part of our global policy framework, underpinned by 'Doing the Right Thing', our Global Code of Conduct.

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

## STATEMENT OF POLICY

This policy has been endorsed by the Europe Executive Committee and applies to all employees, officers, consultants, self-employed contractors, casual workers, agency workers, volunteers and interns.

### PURPOSE

This policy is in place to:

- Encourage a culture that supports disclosure of wrongdoing as soon as possible;
- Reassure staff that they should be able to raise genuine concerns in confidence and without fear of retaliation, even if they turn out to be mistaken; and
- Provide staff with guidance on how to raise concerns.

## WHAT IS WHISTLEBLOWING?

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

- Criminal activity;
- Financial fraud, money laundering or misappropriation of funds;
- Offering or accepting a bribe;
- Breach of our internal policies and procedures including our Global Code of Conduct;
- Danger to health and safety;
- Damage to the environment;
- Failure to comply with, or breach of, legal or regulatory requirements; and
- The deliberate concealment of any of the above matters.

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## Whistleblower Policy

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 (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 standard Grievance Procedure.

If a complaint relates to your own personal circumstances but you also have wider concerns regarding one of the matters set out above (for example, a breach of our internal policies), you should discuss with a Manager or Compliance Officer which route is the most appropriate.

Unsubstantiated allegations that are found to have been made maliciously, or knowingly to be false, will be viewed seriously and may be subject to disciplinary action.

## RAISING A WHISTLEBLOWING CONCERN

A whistleblowing concern can be raised via the following **key contacts**:

- **Compliance Officers /Managers**–
- **Your local People or Legal Functions** – raise concerns via email, phone or face-to-face;
- **Your local Security function** – raise concerns via email, phone or face-to-face; and
- **Safecall** – dedicated, confidential phone line and online service, which is independently run with trained operators available 24/7. Safecall also provides a wide range of language interpreters to support its callers ([www.safecall.co.uk](http://www.safecall.co.uk)).

## CONFIDENTIALITY

We hope that staff will feel able to voice whistleblowing concerns openly under this policy. Completely anonymous disclosures are difficult to investigate. It is also more difficult to establish whether any allegations are credible. 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.

## HANDLING AND INVESTIGATION OF A WHISTLEBLOWING CONCERN

Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment. You may be required to attend additional 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.

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 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.

While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy, you can help us to achieve this.

#### Whistleblower

If you are not happy with the way in which your concern has been handled, you can raise it with one of the other key contacts set out above.

## 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 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 is an external charity that operates a confidential helpline. Their contact details are: [protect-advice.org.uk](https://protect-advice.org.uk)

## PROTECTION AND SUPPORT AVAILABLE TO WHISTLEBLOWERS

We aim to encourage openness and will support whistleblowers who raise genuine concerns in good faith under this policy, even if they turn out to be mistaken.

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 one of the key contacts set out above immediately. If the matter is not remedied, you should raise it formally using our Grievance Procedure.

You must not threaten or retaliate against whistleblowers in any way, nor take steps to try to identify a whistleblower without a good reason. If you are involved in such conduct, you may be subject to disciplinary action.