

Flint Group Speak-Up Policy Overview

Trustworthy is one of Flint Group's core values. We are committed to fostering an open and transparent work environment where all employees and associated third parties can voice concerns about potential wrongdoings without fear of retaliation. Our Speak-Up Policy aligns with ISO 37002:2021 and outlines how you can safely report any unethical or illegal behaviour and the steps we take to address these concerns.

Key Principles / Commitments:

Purpose: This policy encourages everyone to report concerns about violations of our Code of Conduct, our company policies, or the law. This includes issues like fraud, bribery, corruption, discrimination, safety breaches, and misuse of company resources.

Reporting Channels: You can report your concerns through various channels:

- **Direct Reporting for employees**: You can speak to your line manager or Human Resources if you observe any unethical behavior.
- Anonymous Reporting for employees and third parties: If you prefer to remain anonymous, you can use our confidential <u>Integrity Assurance Hotline</u>, available 24/7. This service allows you to report concerns securely, either online or via telephone.

Confidentiality: We take your privacy seriously. All reports are handled with strict confidentiality, and information is only shared with those directly involved in the investigation, as required by law. If you choose to report anonymously, your identity will be protected, and we will not attempt to trace it.

Protection Against Retaliation: We strictly prohibit any form of retaliation against individuals who report concerns in good faith. Retaliation can include dismissal, demotion, or any other adverse treatment. We are committed to ensuring that you feel safe and supported when speaking up.

Investigation and Outcomes: All reports are promptly and impartially investigated, with outcomes ranging from training and mediation to disciplinary actions as needed. Even if a report is unfounded, underlying issues may still be addressed to foster a positive work environment.

Training and Governance

Flint Group ensures that employees receive regular training on the Speak-Up Policy and the associated reporting mechanisms. Investigators are specifically trained to handle reports with



impartiality and professionalism. The company continuously monitors and updates the policy to maintain its effectiveness and integrates whistleblowing into its broader governance frameworks.

Whistleblower Protection: We fully support those who raise concerns, even if the reported issue turns out to be unfounded. Our priority is to maintain a culture of openness and trust, where employees and partners feel empowered to speak up.

Misuse of the Policy: Reports should be made with a genuine belief that a wrongdoing has occurred. False or malicious reports made with the intent of personal gain may result in disciplinary action.

Commitment to an Open and Transparent Work Environment

Flint Group is dedicated to fostering a culture of openness and accountability. We believe that fostering and open and transparent work environment is crucial to maintaining a positive and ethical work environment.