

Whistleblowing Statement

Employees are often the first to realise that there may be something seriously wrong or a mis-doing happening within the Company.

However, they may not express their concerns because they feel that speaking up would be disloyal to their colleagues or to the Company. They may also fear harassment or victimisation. In these circumstances it may be easier to ignore the concern rather than report what may be just a suspicion of malpractice.

The Delamode Group is committed to the highest possible standards of openness, integrity, and accountability. In line with that commitment we expect employees and others that we deal with, who have serious concerns about any aspect of the Company's work to come forward and voice those concerns.

It is recognised that most cases will have to proceed on a confidential basis This Statement makes it clear that employees can speak up without fear of victimisation, subsequent discrimination or disadvantage.

As a group our aims are:

- To encourage employees to feel confident in raising serious concerns and to question and act upon concerns about practice.
- To provide avenues for employees to raise concerns and receive feedback on any action taken.
- To reassure employees that they will be protected from reprisals or victimisation if they have a reasonable belief that any disclosure was made in good faith.

This whistleblowing statement is intended to cover concerns that fall outside the scope of other procedures.

- Acts which are unlawful.
- Acts against the Company's policies.
- Acts which fall below established standards or practice.
- Acts which amount to improper conduct.

Confidentiality

It is Delamode's commitment to protect the identity of any employee who raises a concern, however it must be appreciated that any investigation process may reveal the source of the information and a statement may be required as part of the evidence.

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