	Nexus Packaging Ltd	Ref No:	Rev No:
	Title: Whistleblowing Policy	POL-15	01

May 2025

### **WHISTLEBLOWING POLICY**

#### **Scope and Purpose:**

This policy applies to all employees, apprentices, workers and anyone else who has a contract to carry out work for the Company personally. It does not apply to genuinely self-employed workers who run a profession or business on their own account.

You should use this policy if you wish to raise concerns about wrongdoing of the nature listed below. If you are an employee and would also like us to deal with the matter as a formal grievance, for example because it affects you personally, you should tell us.

If you have a concern relating to one of the areas listed below, the matter can be reported in the manner set out in this policy without fear of reprisals.

The purpose of this policy is to enable us to investigate and deal properly and sensitively with any such allegations of wrongdoing which you raise.

We will not tolerate wrongdoing by workers at any level.

#### **Types of wrongdoing addressed by this policy:**

If you genuinely believe that the Company, or any of our workers, has taken, is intending to, or has failed to take action that you reasonably believe will lead or amount to:

- A criminal offence;
- A failure to comply with any legal obligations;
- A miscarriage of justice;
- A breach of data confidentiality
- Financial irregularity
- Danger to the health and safety of any individual;
- Damage to the environment; or
- The deliberate concealment of information tending to show any of the matters listed above

You can disclose this information verbally or in writing to the HR Department. If you make such a disclosure, you should provide full details and, where possible, supporting evidence.


#### **Types of wrongdoing not addressed by this policy:**

Personal grievances are not addressed in this policy, and you should use the company grievance procedure, (for example allegations of bullying, harassment, discrimination).

Personal grievances are not covered by whistleblowing law, unless the particular case is in the public interest.

#### **Investigating allegations of wrongdoing:**

It is important that these types of issues are dealt with sensitively and quickly. Anonymous disclosures are strongly discouraged as they are likely to hinder effective investigation. If you disclose information in accordance with this policy, in so far as it is reasonably practicable, we will keep your identity confidential.

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We will promptly investigate your allegation, during the course of which we may require your assistance. Your allegation will be addressed seriously, and you will be informed of the outcome of the investigation as soon as practicable. We will take whatever action we consider appropriate.

**Action we may take:**

If you reasonably believe that the nature of your concern relates to any of the areas set out above and you disclose this information to the appropriate person under this policy in good faith, no action will be taken against you for making the disclosure.

We will, however, take appropriate action against any person found to be:

- Victimising another person for using this policy;
- Deterring any person from reporting genuine concerns under it; or
- Making the disclosure/allegation maliciously or vexatiously or where there were no reasonable grounds for believing that the information supplied was accurate.
- For employees, this may involve us taking disciplinary action, which may result in dismissal.

**Status of this policy:**

This policy does not give contractual rights to individual employees. The Company reserves the right to alter any of its terms at any time although we will notify you in writing of any changes.

Sign Off

