

Group Whistleblowing Policy

Scope

This Policy defines the commitment of Marlowe plc ('Marlowe') to respect and protect the right of employees to report suspected illegal or unethical behaviour. This Policy applies to all Marlowe operations, and the Marlowe Board of Directors has ultimate responsibility for the implementation of this policy

Introduction

'Marlowe is committed to respecting and upholding the rights of whistleblowers. The Group encourages a 'speak-up' culture to ensure that any employee who has concerns about illegal or unethical behaviour will be able to make a formal report, and that they will be able to report confidentially and anonymously if they choose

A whistleblower is an employee who discloses/reports reasonable concerns that their employer is engaging in unethical or illegal activity

Whistleblowing should not be confused with employee grievances. In order to fall under the whistleblowing category, an employee must reasonably believe that the information they are disclosing is in the public interest and that it falls into one of the following guideline categories:

- criminal offences (this may include, for example, types of financial impropriety such as fraud)
- failure to comply with an obligation set out in law
- miscarriages of justice
- endangering of someone's health and safety
- damage to the environment
- covering up wrongdoing in the above categories

In order to ensure that any worker feels able to make a disclosure under our whistleblowing policy, Marlowe PLC commits to:

- Provide training to workers at all levels within the organisation in relation to whistleblowing law and the company's policy on disclosures
- Investigate all disclosures consistently and fairly
- Take all reasonable steps to maintain the confidentiality and anonymity of the reporter if requested (unless required by law to break this confidentiality - if it is necessary or likely that a whistleblower's identity may be disclosed, the company will make every effort to inform the whistleblower in advance)
- Provide employees with an independent hotline to make a disclosure
- Support any employee who makes a disclosure and to ensure that there is no victimisation of any employee who makes a disclosure (any instances of retaliation, bullying, harassment or any adverse consequences for whistleblowers will be thoroughly investigated, and appropriate action taken where necessary. A whistleblower who acts in good faith will be protected from retaliation even if his or her allegations are proved to be incorrect or unsubstantiated)

How to raise a whistleblowing concern

A worker does not need evidence to report a concern. In addition, any confidentiality clauses in any agreements or 'gagging clauses' in settlement agreements do not prevent workers from making disclosures in the public interest. If any employee has reasonable grounds to believe that any unlawful or unethical activity is taking place at any level with Marlowe PLC or any of its associated organisations they are encouraged to raise this in the first instance with their line manager. However where this is not possible or the employee prefers not to discuss with their line manager they may report this in one of three ways

1. Call the Confidential Whistleblowing Helpline

0800 389 0131

Our independent whistleblowing helpline is operated by Crimestoppers and is available 24/7 for any employee to make a disclosure. Upon calling the Hotline, a case handler will discuss their concerns and take down any relevant information which they will compile into a disclosure report.

2. Make a disclosure via the Whistleblowing portal

Marlowe Integrity Line Form

Any employee can log into the 24/7 whistleblowing portal and make a disclosure directly into the system. This information will be reviewed by an independent caseworker and compiled into a disclosure report.

3. Make a disclosure to the Prescribed Person(s)

Prescribes Person(s) are regulatory bodies or individuals such as The Financial Conduct Authority, the HSE or MP's. Depending on the nature of the disclosure, employees may raise their concerns with one of these external bodies or individuals, a full list of prescribed person(s) and the nature of the disclosure they handle can be found at the following government web address along with information on how to contact them

<https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2/whistleblowing-list-of-prescribed-people-and-bodies#data-protection-and-freedom-of-information>

Confidentiality and protection

Marlowe PLC places the utmost importance on ensuring that any employee who makes a disclosure is fully protected and has complete confidence that they are able report concerns anonymously should they wish to do so. We assure this anonymity by working with an independent third party intermediary to provide our whistleblowing hotline.

Timescales and Feedback

Any disclosure made will be acknowledged by the company within 3 working days of receipt. Once the disclosure has been acknowledged, an investigation period will commence which will last for no longer than a duration of 3 weeks. During the investigations period, the

company may contact the whistleblower anonymously to ask questions or request information.

The company will respond to the whistleblower providing an update on the disclosure and whether the issue has been satisfactorily resolved or action taken or, for more complex issues, whether further time is required to investigate. This feedback may not necessarily go into detail on what action precisely has been taken but the company endeavours to ensure that any employee who makes a disclosure is satisfied that it has been investigated and actioned appropriately

Guidance and Information

Employees who are considering making a disclosure may wish to review the guidance available from the government website <https://www.gov.uk/whistleblowing>

This policy was approved by the Marlowe Board on 20th March 2025.