



# Whistleblowing policy

## Policy statement

Trust and integrity are vital to us. We therefore encourage our people to raise any concerns they have about wrongdoing, misconduct, or malpractice, that affects others without fear of reprisal. This policy will define what constitutes ‘whistleblowing’ and detail how any concerns should be raised.

Any whistleblowing concern raised in good faith will be investigated thoroughly, promptly, and confidentially and you will not be victimised for raising your concerns.

Any instruction to ignore or cover up wrongdoing is itself a disciplinary offence. If you are told not to raise or pursue any concern, even by a person in authority such as a manager or departmental head, you should not agree to remain silent. You should report the matter in line with the procedure documented within this policy.

## Who is this for?

This policy covers all our people across the Group entities (including colleagues, agency or self-employed workers), as well as all third parties and supply chain partners who perform services for and on behalf of the Group.

## What is whistleblowing?

The Public Interest Disclosure Act 1998 (the “Act”) amended the Employment Rights Act 1996 to provide protection for workers who raise legitimate concerns about specified matters, known as ‘whistleblowing’. The Act protects individuals who make ‘qualifying disclosures’, which are reports of wrongdoing that affect or have the potential to affect others, and which are raised in good faith and in the public interest.

Complaints that count as whistleblowing include:

- a criminal offence (such as insurance fraud or illegal tax evasion)
- failure to comply with a legal or regulatory obligation
- a miscarriage of justice
- an act or omission endangering the health or safety of any individual
- an act or omission causing damage to the environment or
- deliberate concealment of any of the above.

Examples of such complaints might include (but are not limited to):

- unsafe working conditions
- lack of, or poor, response to a reported safety incident
- inadequate induction or training for our people
- suspicions of fraud

- a bullying culture (across a team or business rather than individual instances of bullying which are best reported in line with our grievance policy (see below))

It is not necessary for you to have proof that such an act is being, has been, or is likely to be committed – a reasonable belief is sufficient. It is the Group’s, rather than your responsibility, to ensure an investigation takes place.

Maliciously or vexatiously making a false allegation or making an external disclosure that is not protected by the provisions of the Public Interest Disclosure Act 1988 may result in disciplinary action.

This policy is distinct from our grievance procedure. If you have a complaint relating to your personal circumstances in the workplace, our grievance procedure is the best way to raise your complaint.

<b>How is whistleblowing different to raising a grievance?</b>	
<b>Whistleblowing</b>	<b>Grievance</b>
Whistleblowing is about raising concerns relating to wrongdoing, risk or malpractice that affect others.	Grievances are typically issues about how you as an individual are being treated.
Concerns should be raised in the public interest. Unlike grievances, they may not personally affect you, but they are likely to have wider implications on the public.	Grievances tend to be raised about things you are asked to do at work, breaches to your contract of employment and any bullying/harassment in the workplace for example.

If you feel it is not possible or appropriate to raise a grievance with your manager/supervisor or the next level of manager/supervisor, or if you reasonably consider the manager/supervisor will not or has not dealt with the grievance sufficiently or at all, you may raise the concern with your People team, the Director of internal audit & risk, the Group general counsel or another member of the Executive leadership team.

Anyone who wants free, confidential advice on what is protected by the act and how best to raise their concerns, can contact the independent charity below, which offers free and confidential advice:

**Protect (formerly Public concern at work)**

Telephone: 020 3117 2520

Website: [www.protect-advice.org.uk](http://www.protect-advice.org.uk)

**Roles and responsibilities**

The **Executive leadership team** will:

- demonstrate commitment to developing an open culture within M Group through actions and strategy
- receive and review regular updates on whistleblowing activity via board papers; and,
- appoint individuals to manage whistleblowing across the Group. The appointed individuals are the Director of internal audit & risk, Senior internal audit manager and Head of ER – group support (the “Designated officer(s)").

**Designated officer(s)** have lead responsibility for the whistleblowing procedure and for dealing with issues raised. They will:

- oversee and review this policy
- provide advice and support to individuals within the scope of this policy
- ensure learning from whistleblowing cases is fed back to the wider company
- investigate promptly and thoroughly any whistleblowing concerns raised
- keep the Executive leadership team informed of reported disclosures (maintaining the confidentiality of the reporter) and the actions being taken; and,
- provide updates within board papers on whistleblowing.

**All individuals in scope of this policy** have responsibility to:

- report wrongdoing (whistle blow) under the circumstances set out in this policy; and,

- complete our mandatory training modules.

**Line managers/People directors** are responsible for:

- ensuring individuals within scope of this policy are aware of it, and their responsibilities under it
- fostering an open culture, ensuring any whistleblower is not subject to detriment; and,
- communicating any concerns raised to them to one of the Designated officer(s), or via the Navex hotline if preferable.

### How to raise a concern

If you have a concern, you should act promptly so it can be investigated as soon as possible.

An independent whistleblowing hotline is available, operated by Navex. Reports can be made via a call, where an independent call agent will record your concerns, or via an online form, anonymously where required, as per the below:



Dial: 0-800-89-0011 (British Telecom)

Then dial: 833 573 1738

[mgroupspeakup.ethicspoint.com](http://mgroupspeakup.ethicspoint.com)

### What we will do

Once you have raised your concern, it will then be shared with the Designated officer(s), who will review the concern and decide what action needs to be taken. This may include an internal investigation, interviews, support from other teams and external parties if needed. You will receive acknowledgement your concern has been received and is being investigated; you may be asked for further information during the investigation if you're willing to provide it and will be informed when the investigation has concluded.

The outcome of the investigation will be shared with appropriate members of the Executive leadership team to determine the appropriate course of action, which may include reporting the matter to a government department or regulatory agency.

The identity of anyone making whistleblowing disclosures will be kept confidential at all times as far as is possible. We acknowledge however, in some circumstances it may be possible for others to deduce identity from the action taken by us to investigate, or to remedy, the wrongdoing. During investigations, efforts will be made to find independent and separate evidence for any reported suspicion. However, circumstances may arise where an investigation cannot be concluded or progressed further unless you are willing to have your name cited in wider discussions. In such a situation, consent would be obtained before further action was taken.

Reports that are considered grievances rather than whistleblowing will be referred to the correct grievance process.

### External disclosure

There are external bodies such as the appropriate regulatory authority, police or a Member of Parliament it is possible to raise whistleblowing concerns with. However, unless you have followed this procedure and are genuinely and reasonably dissatisfied with the outcome, concerns should be raised via the internal processes defined in this procedure and not externally. The concern raised will be fully investigated and other external parties notified if necessary.

### Safeguards

M Group will not (and will use reasonable endeavours to ensure that our people do not), subject others to any detriment as a result of raising a whistleblowing disclosure. Any such treatment should be immediately reported via Navex.

You won't be subjected to any disciplinary action for making a disclosure in good faith in accordance with this procedure. However, if we believe the disclosure has been made maliciously or vexatiously, or where an external disclosure is made when not 'protected' by the provisions of the Act, then we may bring disciplinary action.

Any victimisation or reprisals against a whistleblower or any attempt to deter them from raising a concern will be treated as a disciplinary matter under our disciplinary procedures.

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