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Whistleblowing Policy

29 September 2026

Introduction and scope

How we operate should reflect our Values: Responsible, Open, Together and Ambitious.

Trust and integrity are vital to M Group. We therefore encourage our colleagues to raise any concerns they have about wrongdoing, misconduct, or malpractice, that affects others without fear of reprisal. This Policy sets out what constitutes 'whistleblowing' and details how any concerns should be raised.

This Policy applies to all M Group colleagues, workers, agency workers and consultants, including those working for or on behalf of M Group subsidiaries, and all third parties and supply chain partners who perform services for and on behalf of M Group.

What we expect from you

Our expectation is to Speak Up.

We encourage everyone to speak up if something doesn't feel right. Raising concerns at an early stage helps us maintain a safe, ethical and transparent working environment.

If you become aware of any conduct that you believe may be unlawful, unethical or inconsistent with our policies, we expect you to let us know. Whistleblowing concerns raised in good faith will be investigated thoroughly, promptly, and as confidentially as possible and you will not be disadvantaged or treated unfairly for raising your concerns.

We also expect you to follow this policy when reporting concerns and to provide as much information as possible to support any investigation.

You should never feel that you need to stay silent. Any instruction to ignore or conceal wrongdoing is itself a serious matter. If you are asked not to raise a concern, regardless of who is asking, you should not agree to remain silent and should report the matter in line with this policy.

Maliciously or vexatiously making a false allegation or making an external disclosure that is not protected under whistleblowing may result in disciplinary action.

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Whistleblowing and what it means

The Public Interest Disclosure Act 1998 (the 'Act') provides protection for workers who raise legitimate concerns about specified matters, known as 'whistleblowing'. The Act protects individuals who make a 'qualifying disclosure', which is a report of wrongdoing that affects, or has the potential to affect others, which is 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):

- Sexual harassment in the workplace or connected to employment.
- 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 GRP-POL-PPL-0010 - Grievance Policy and Procedure (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.

Choosing the right route

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.

How is whistleblowing different to raising a grievance?

Whistleblowing	Grievance
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 that the Manager/Supervisor will not or has not dealt with the grievance sufficiently or at all, you may raise the concern with the People Team or the Designated Officers noted within this Policy.

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Who's responsible

We all have a part to play.

The Executive Leadership Team will:

- Demonstrate commitment to developing an open culture through actions and strategy;
- Receive and review regular updates on whistleblowing activity via Board papers; and,
- Appoint colleagues, known as Designated Officers, to manage whistleblowing. The appointed colleagues are the Director of Internal Audit & Risk, Head of Internal Audit, and Group General Counsel.

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 colleagues within the scope of this Policy.
- Ensure learning from whistleblowing cases is fed back to the wider Group.
- 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.
- Provide updates within Board papers on whistleblowing.

All colleagues in scope of this Policy have responsibility to:

- Report wrongdoing (whistleblowing) under the circumstances set out in this Policy.
- Complete mandatory training modules.

Line managers/ People Team are responsible for:

- Ensuring colleagues 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.
- Communicating any concerns raised to them to one of the Designated Officer(s), or via the Navex hotline if preferrable.

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:

NAVEX GLOBAL

For UK & Northern Ireland call: 0800 652 7362
For Ireland call: 1800 456 816
Weblink: mgroupspeakup.ethicspoint.com

If you would like free, confidential advice about making a whistleblowing disclosure and how best to raise a concern, you can contact the independent charity; Protect (formerly Public Concern at Work), they can be contacted via telephone on 020 3117 2520, or you can visit their website at www.protect-advice.org.uk

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What we'll do when a concern is raised

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 that your concern has been received and is being investigated; you may be asked for further information during the investigation if you are 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 a whistleblowing disclosure will be kept confidential at all times as far as is possible. We acknowledge however, that in some circumstances it may be possible for others to deduce identity from the action taken by officers 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.

External Disclosure

There are external bodies such as the appropriate regulatory authority, police or a Member of Parliament that 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

We will not (and will use reasonable endeavours to ensure that our colleagues 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 will not be subjected to any disciplinary action for making a disclosure in good faith in accordance with this procedure. However, if we reasonably believe that the disclosure has been made maliciously or vexatiously, or where an external disclosure is made when not "protected" under Whistleblowing then we may bring disciplinary action.

Any detriment or unfair treatment 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.

Authorisation

Signed by:
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Chris Keen – Chief Financial Officer

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Document history

Version	Date	Author	Approved By	Change Log
1.0	29/09/26	Erica Shea	Lauren Harper	Reformatted historic document with new DRN and version for inclusion in the Group BMS and reviewed by document author
Historic v.5.0	03/07/26	Erica Shea	Lauren Harper	Held with legacy function owners

Please note: Full document history will be recorded and held by the Group BMS Team from the point of document inception into the Group BMS (V1.0) above for all documents within scope. Previous document history will be held and recorded by the legacy Function/ Divisional document owners in accordance with their archive and document management processes.