



ACEON GROUP: WHISTLE BLOWING POLICY & PROCEDURES

AceOn is committed to maintaining the highest standards of integrity, ethics, and accountability in all aspects of our business, including our relationships with customers and suppliers.

This Whistleblowing Policy provides a framework for employees and others to raise concerns about potential wrongdoing or malpractice, both within AceOn and involving our customers and suppliers. This includes any concerns related to harassment, including sexual harassment. We recognise that reporting sexual harassment can be particularly difficult, and we assure individuals that such reports will be treated with the utmost seriousness and sensitivity.

We value transparency and encourage open communication. This policy ensures that those who report concerns in good faith will be protected from retaliation.

This Whistleblowing Policy is available to all employees, contractors, consultants, and others acting on behalf of AceOn. It should be read in conjunction with our Equal Opportunities, Dignity at Work and harassment at Work policies, which provides detailed information on what constitutes harassment, including sexual harassment.

This Whistleblowing Policy will be reviewed and updated annually to ensure its effectiveness and compliance with applicable laws and regulations.

Purpose

The purpose of this policy is to:

- Provide a confidential and accessible process for reporting concerns about potential wrongdoing.
- Protect individuals who report concerns from any form of reprisal or victimization.
- Ensure that all concerns are investigated thoroughly and fairly.
- Promote a culture of openness and accountability within AceOn and throughout our business relationships.
- Facilitate the reporting of harassment, including sexual harassment, and ensure these reports are addressed appropriately.

Scope

This policy is divided into 2 main parts: It applies to all employees, contractors, consultants, and anyone acting on behalf of AceOn. Secondly, it also covers concerns relating to our clients and suppliers.

A. Whistle Blowing for Our Employees

This policy and procedure is incorporated in our Staff Handbook.

If you become aware of any criminal offence or other wrongdoing in the workplace and you believe it to be in the public interest, you should report it immediately by following the whistle blowing procedure. This procedure is not legally binding and does not form part of your contract of employment.

Whistle Blowing Procedure

Principles:

In accordance with the Public Interest Disclosure Act 1998 and the Employment Rights Act 2025, the Company has instituted a system for reporting information which in your reasonable belief points to a wrongdoing at work and is in the public interest.

A wrongdoing is any of the following:

- a **criminal offence** has been or is likely to be committed;
- a person has failed, is failing or is likely to fail to **comply with a legal obligation**;
- a **miscarriage of justice** has happened, is happening or is likely to happen;
- the **health and safety of an individual** has been, is being or is likely to be damaged;
- **damage to the environment** has occurred, is occurring or is likely to occur;
- **a person is experiencing or has experienced sexual harassment by a work colleague or customer or client or supplier; or**
- **information showing any of the above** has been, is being, or is likely to be, deliberately concealed.

The Company wishes to ensure that any such wrongdoings are reported and dealt with. If you become aware of a wrongdoing at work, then please follow the procedure below immediately. If you believe that the Company's managers may be involved in the wrongdoing, and then please approach the Managing Director directly.

Procedure:

1. If you become aware of a wrongdoing, raise your concerns immediately with your manager. Your manager will carry out a prompt and thorough investigation of the matter and report his/her findings to the Managing Director. The Managing Director will take any necessary action including, if appropriate, reporting the matter to the relevant external authority. Where, as a result of the disclosure, it is necessary to take disciplinary action against an employee, this will be done in accordance with the Company's formal discipline procedure. Your manager will inform you of the outcome of the investigation and any actions taken as a result.
2. If you are not satisfied that your disclosure has been dealt with properly or you believe that your manager or any of the Company's managers are involved in the wrongdoing, raise your concerns directly with the Managing Director. The Managing Director or an authorised deputy will arrange for an investigation or further investigation to be carried out. The Managing Director will take any necessary action including, if appropriate, reporting the matter to the relevant external authority. Where, as a result of the disclosure, it is necessary to take disciplinary action against an employee, this will be done in accordance with the Company's formal discipline procedure. You will be informed of the outcome of the investigation and any actions taken as a result.

Victimisation and Protection of a Whistleblower

The Company will not tolerate the victimisation of any person who discloses a wrongdoing under this procedure. Any such victimisation will be treated as a disciplinary offence. Under whistleblowing law, a report of sexual harassment is now formally classed as a 'qualifying disclosure' and the whistleblower is protected from any form of detriment.

Grievances

The above procedure should be used where, in your reasonable belief, the disclosure of information relates to a wrongdoing at work and is in the public interest. If you wish to raise a personal grievance, you should follow the Company's grievance procedure.

B. WHISTLE BLOWING FOR OUR CUSTOMERS & SUPPLIERS

We encourage customers and suppliers to raise concerns as soon as possible after becoming aware of them. Examples of potential wrongdoing are as outlined above.

Concerns should be reported through one of the following channels:

- Directly to the Managing Director, Richard Partington, or Finance & HR Director, Ania Frajfeld: This is the preferred initial point of contact. Richard or Ania will provide a safe space to voice concerns and will ensure they are taken seriously.
- Alternative Contact Persons: If the concern involves Richard and/or Ania, or if an individual is uncomfortable reporting to one of them, they may contact the Group Chief Executive Officer, Mark Thompson.
- Anonymous Reporting: Where permitted by law, reports can be made anonymously. However, it is helpful to provide contact details, if possible, to allow for follow-up questions.
- External Reporting (if appropriate and permissible): In certain circumstances, and where permitted by law, concerns may be reported to an external regulatory body or authority.

If a reported concern does not qualify as a whistleblowing issue under this policy, Richard, Ania or Mark will provide the stakeholder with a formal written rationale explaining why it wasn't accepted and suggest the most appropriate course of action.

Confidentiality

All reports will be treated with confidentiality to the extent possible and permissible by law. We will make every effort to protect the identity of individuals who report concerns in good faith, including ensuring data is protected. The investigator will conduct a baseline risk assessment to ensure the reporter's role or standing is safeguarded during the process.

There will be no retaliation or victimisation against anyone who reports a concern, even if the concern turns out to be unsubstantiated. Any form of retaliation will be treated as gross misconduct and will be subject to serious disciplinary action, up to and including summary dismissal.

Investigation

All reported concerns will be investigated thoroughly, impartially, and in a timely manner. We will acknowledge receipt of a report within 7 business days and aim to complete the initial assessment and communicate next steps within 30 business days.

The investigation will be conducted by Richard, Ania or Mark or another appropriate individual/team, as determined by AceOn.

All stages of the investigation, including findings and actions taken, will be documented and retained securely, including interview notes. We aim to resolve all concerns promptly and within a reasonable timeframe as outlined above. However, the complexity of the investigation may impact the exact duration.

If the initial investigation does not lead to a satisfactory resolution, the concern can be escalated to Kevin.

If the concern relates to a client or a supplier, the following process will be followed:

1. **Assessment:** The assigned investigator will assess the nature of the concern and determine the appropriate course of action.
2. **AceOn's Internal Investigation:** Where the whistleblowing concern raised relates to the conduct of AceOn's employee(s), a prompt and thorough investigation of the matter will be undertaken and findings reported to the lead Senior Manager. The lead Senior Manager will take any necessary action including, if appropriate, reporting the matter to the relevant external authority. Where, as a result of the disclosure and subsequent finding, it is necessary to take disciplinary action against an employee(s), this will be done in accordance with the Company's formal discipline procedure.
3. **Client's Whistleblowing Route:** If the client has a designated whistleblowing procedure, the investigator will guide and support the individual who raised the concern in following that procedure. This may involve helping them understand the client's process, preparing any necessary documentation, or accompanying them to meetings if appropriate.
4. **Raising with the Client (If No Formal Procedure):** If the client does not have a clear whistleblowing procedure, the investigator will work with the individual to determine the best way to raise the concern directly with the client. This will be done in a manner that protects the individual's identity and minimises the risk of retaliation, to the extent possible and permissible by law and the agreement with the client.
5. **Internal Investigation (If Applicable):** If the client-related concern also involves internal issues within AceOn (e.g. an AceOn employee facilitating the client's wrongdoing), an internal investigation will be conducted concurrently.

Feedback and Communication

We will provide feedback to the individual who reported the concern, where possible and appropriate, about the outcome of the investigation and any actions taken. However, due to confidentiality reasons, we may not be able to provide full details of the investigation or disciplinary actions taken. While respecting confidentiality, we will communicate status updates at key milestones as well as the general outcomes of investigations to the reporting individual, as appropriate.

False or Malicious Allegations

While we encourage reporting in good faith, this policy should not be used to make false or malicious allegations. Individuals who make knowingly false or malicious reports may be subject to disciplinary action.

SIGNED: *Richard Partington*

POSITION: MANAGING DIRECTOR

DATE: 10 AUGUST 2026