

Amalthea Holdco Limited and its group of companies (“SRL”) encourage a free and open culture in dealings between its managers, employees, and all people with whom it engages in business and legal relations. We recognise that effective and honest communication is essential if concerns about breaches or failures are to be dealt with effectively and the organisation’s success ensured. If you think we are doing something we should not, we encourage you to raise it. This would include breaches of legal obligations, risks to health and safety, criminal acts, or damage to the environment.

This policy is designed to provide guidance to all those who work with or within the organisation who may from time to time feel that they need to raise certain issues relating to the organisation with someone in confidence.

Workers who, in the public or company interest, raise genuine concerns under this policy will not under any circumstances be subjected to any form of detriment or disadvantage<sup>1</sup> because of having raised their concerns.

If you reasonably believe your concern is true, you are entitled to not be subjected to any detriment or disadvantage as a result of raising it. This is true even if your concern turned out to be incorrect

## Procedure

This policy will apply in cases where a worker genuinely believes that a breach of legal obligations, risks to health and safety, criminal acts, or damage to the environment has occurred or may occur within the organisation. SRL will not tolerate such matters, which include:

- The committing of a criminal offence or a miscarriage of justice.
- A failure to comply with any legal obligation.
- A breach of health and safety rules
- Damage to the environments.
- Concealment of information tending to show any matter falling within any one of the paragraphs below.

There is no need for a worker to prove that the breach or failure that they are alleging has occurred or is likely to occur; a reasonable suspicion will suffice, i.e., where the worker reasonably believes that the information disclosed is substantially true.

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<sup>1</sup> A worker who makes a disclosure is protected from detrimental treatment by the organisation, by a co-worker or by an agent of the organisation. An employer is vicariously liable for detrimental treatment. If this occurs, it should be raised immediately so that the matter can be investigated thoroughly without undue delay. Detrimental treatment includes, for example, harassment and bullying or not complying with a person’s rights and entitlements under their contract of employment.

A worker is also protected from dismissal by the organisation for making a protected disclosure. If a worker wishes to raise a concern, they should contact any of:

- The group Chairman (Richard Tredwin, Richard.Tredwin@srl.co.uk).
- The group CEO (Mark Eburne, mark.eburne@srl.co.uk).
- The group CFO (John McLaughlin, John.McLaughlin@srl.co.uk).
- A Departmental / Divisional Director; or
- Their line manager.

This person will, insofar as is possible, treat the matter in confidence. It is likely that an investigation will be necessary and the worker who has made the disclosure may be required to attend an investigatory hearing and/or a disciplinary hearing (as a witness).

Appropriate steps will be taken to ensure that the worker's working relationships are not prejudiced by the fact of the disclosure.

**This Policy Statement is reviewed annually.**



Mark Eburne  
**Chief Executive Officer**

Dated: 23<sup>rd</sup> August 2024

## Version Control

<b>Version</b>	<b>Release Date</b>	<b>Reviewer</b>	<b>Approval Date</b>
1.1	September 2024	John McLaughlin	August 2024