

# GROUP POLICY

# Whistleblowing

## Contents

1	Purpose .....	2
2	Scope .....	2
3	Awareness and Communication.....	2
4	Our Commitment to Speaking Up .....	3
5	Raising Concerns Internally.....	3
5.1	Speak to Someone you Trust.....	3
5.2	Use the Confidential Hotline .....	3
6	How to Make a Report .....	4
7	Investigation and Follow-up Process .....	4
8	Protection from Retaliation .....	5
9	Raising Concerns Externally.....	6
10	Audit and Oversight .....	6
11	Compliance & Non-Compliance .....	7
12	Contacts .....	7

## Document Control

Policy owner:	Group General Counsel
Published / effective from:	September 2025
Review frequency:	Annual
Next review date:	May 2026
Version:	5.0



## 1 Purpose

The purpose of this policy is to provide clear guidance and protection for anyone raising concerns about wrongdoing in the workplace. Diploma PLC (“Diploma”) is committed to conducting business with honesty and integrity and creating an environment where colleagues feel safe and empowered to speak up.

Like all organisations, we acknowledge the potential for misconduct. This may include financial malpractice (e.g., bribery, corruption), breaches of company policy, violations of legal or regulatory obligations, or efforts to conceal such actions.

We are committed to fostering a culture of openness and accountability. If you raise a concern in good faith – even if it proves to be mistaken – you are protected under this policy and relevant laws. Early detection allows us to take prompt corrective action to safeguard our people, business, and reputation. This policy is accessible via the Diploma [website](#) and on our internal learning management system (the Purple Portal).

## 2 Scope

This policy applies across the entire Diploma Group and is intended for all individuals connected to our operations. It includes all directors, officers, and employees of Diploma PLC and its subsidiaries, regardless of the country in which they operate.

Anyone with a concern about potential wrongdoing or misconduct is encouraged to report it. This includes, but is not limited to:

- Current and former employees
- Contractors, suppliers, and service providers
- Trainees and interns
- Members of the communities where we operate
- Their partners, dependents, and relatives

Diploma respects local legal obligations. Where stricter or more specific local laws apply – such as those covering investigation procedures or whistleblower rights – management must implement a local addendum. The Group General Counsel should be informed in such cases.

## 3 Awareness and Communication

Diploma is committed to ensuring that everyone covered by this policy is aware of their right to speak up and knows how to do so. To support this:

- This policy is available on the Diploma website and via our learning management system (the Purple Portal).
- All Diploma businesses must display whistleblowing posters in prominent workplace locations to help colleagues understand how to raise a concern safely and confidentially.
- Local leadership teams are responsible for ensuring their colleagues are aware of this policy and the available reporting channels.
- As part of ongoing oversight and support, Internal Audit shares information about the whistleblowing helpline and this policy during all site visits. This includes providing basic awareness training to local employees, reinforcing the importance of speaking up and how to do so confidentially.

Diploma believes that open communication and accessible resources are essential to building and maintaining a culture of integrity and trust.

## 4 Our Commitment to Speaking Up

Diploma's Board of Directors is fully committed to creating a safe and transparent environment where concerns about misconduct can be raised without fear. If you report a concern in good faith, you will not face any form of retaliation, victimisation, or disadvantage.

Any colleague found to have retaliated against someone for raising a concern will be subject to disciplinary action. All concerns raised will be treated seriously and, where requested, confidentially. You will not be expected to prove wrongdoing - only to raise the issue with honest intent. You will normally receive feedback about how your concern was handled, although some details may remain confidential to protect others.

The Board of Directors retains overall accountability for the integrity and effectiveness of Diploma's whistleblowing framework. It receives updates on matters raised and supports continuous improvement in ethical conduct and reporting culture across the Group.

This policy is reviewed annually to ensure it remains effective, current, and aligned with legal and ethical standards.

## 5 Raising Concerns Internally

You are encouraged to raise concerns as early as possible, even if you're not certain whether something constitutes wrongdoing. Diploma provides both informal and formal options to support you in doing so.

### 5.1 Speak to Someone you Trust

If you have a concern about a suspected breach of policy, misconduct, or wrongdoing, speak to someone you trust. This could include:

- Your line manager
- Your Managing Director or President
- The [Group HR Director](#)
- The [Group General Counsel](#)
- The Group Chief Executive Officer ([CEO](#)) or Chief Financial Officer ([CFO](#))

If you are uncomfortable raising the issue with one of the individuals listed above, or you feel your concern has not been addressed appropriately, you can use our independent confidential hotline.

### 5.2 Use the Confidential Hotline

Diploma's Confidential Hotline is managed by Safecall, an independent third-party reporting service. Safecall is available 24 hours a day, 7 days a week.

You can report your concerns through any of the following channels:

- **Freephone:** check the Safecall [website](#) for the local number in your country
- **Online:** [safecall.co.uk/file-a-report](https://safecall.co.uk/file-a-report)
- **Email:** [diploma@safecall.co.uk](mailto:diploma@safecall.co.uk)

When you contact Safecall by phone, a trained operator will take your report in confidence. Your call will not be recorded. You may choose to:

- Provide your name
- Remain semi-anonymous
- Remain fully anonymous

Safecall will forward your report securely and confidentially to the Group General Counsel for appropriate action.

This policy is accessible on the Diploma website and via the internal local management system (Purple Portal).

## 6 How to Make a Report

If you become aware of – or suspect – unethical, illegal, or improper behaviour connected to Diploma, you are encouraged to report your concerns as early as possible.

You do not need to have all the details before making a report. Acting in good faith is what matters. You can always provide further information later if needed.

When reporting a concern, please share as much relevant information as you can, including:

- A summary of the issue or behaviour
- Background, history, and context
- Relevant dates, locations, and names (if known)
- Any supporting documents or references

These details help us respond and investigate effectively. However, don't let a lack of information stop you from coming forward.

Note: If your concern relates specifically to your personal circumstances at work (such as interpersonal issues or job conditions), it may be more appropriate to raise it with your line manager or local HR team as a grievance.

## 7 Investigation and Follow-up Process

The key steps when you voice your concerns under this policy include the following:

### 1. Acknowledge the report

The individual receiving your report (or Safecall, if reported via the hotline) will record its receipt and notify the Group General Counsel.

### 2. Initial review

The Whistleblowing Oversight Committee – comprising Internal Audit, the Group General Counsel, and/or the Group CFO, as appropriate – will assess the report to determine whether and how to proceed. This includes deciding whether an investigation is necessary and designating the most appropriate party to lead the investigation. The Committee may also consult relevant experts, departments, or local management to support this decision.

### 3. Investigation

If an investigation is initiated, it will be proportionate, confidential, and objective. Where the investigation is not led by Internal Audit, the assigned team will receive a scope document prepared by the Committee, rather than the original whistleblowing report, to maintain confidentiality. Internal Audit maintains oversight of all investigations arising from reports received via the whistleblowing framework (see Section 10).

### 4. Outcome and action

If wrongdoing is confirmed, appropriate action will be taken. This may include disciplinary action and, where necessary, referral to external authorities.

### 5. Feedback

Where appropriate and possible, you will receive updates on the outcome. Some details may be withheld to protect confidentiality or legal obligations.

Additional notes:

- All concerns will be treated seriously and sensitively.
- You do not need to provide proof – just raise the issue in good faith.
- Anonymous reports will be considered. While they can be more difficult to investigate, they are not disregarded.
- If the person reporting is themselves involved in wrongdoing, they will not be granted automatic immunity. However, their decision to come forward may be taken into account.
- Both parties are expected to maintain confidentiality throughout the process.

## 8 Protection from Retaliation

Diploma does not tolerate retaliation or any form of detrimental treatment against individuals who:

- Raise a concern in good faith
- Contemplate raising a concern
- Assist or participate in an investigation

Protection applies even if the concern proves to be mistaken or unfounded, as long as it was reported in good faith.

Retaliation includes, but is not limited to:

- Dismissal or demotion
- Loss of benefits or opportunities
- Bullying, harassment, or victimisation
- Any action that causes harm or disadvantage

Disciplinary action will be taken against anyone found to have retaliated against a whistleblower or a person supporting the investigation process.

To safeguard those raising concerns, strict confidentiality protocols are maintained throughout the process. Internal Audit and the oversight committee ensure that only designated individuals involved in an investigation receive necessary information – and where appropriate, this is limited to anonymised or scoped documentation (see Section 10). These safeguards reinforce trust and reduce perceived risk for individuals coming forward.

This protection applies to all individuals covered by this policy, including employees, former employees, contractors, and associated persons.

## 9 Raising Concerns Externally

Diploma encourages all concerns to be raised internally wherever possible, using the channels set out in this policy. Internal reporting allows us to address matters quickly, confidentially, and with appropriate support. However, if you feel unable to raise a concern internally – or believe that doing so may place you at risk – you have the right to raise your concern externally.

You may consider reporting to:

- A regulatory authority (e.g., the Financial Conduct Authority, HMRC, or a professional body)
- A prescribed person or body under the Public Interest Disclosure Act 1998 (for UK-based colleagues)

We recommend seeking independent legal advice before raising a concern externally, to ensure you remain protected under applicable whistleblowing laws.

External reporting does not impact your right to protection if your concern is made in good faith and meets the relevant legal thresholds.

## 10 Audit and Oversight

Internal Audit (IA) plays a critical role in maintaining the integrity and effectiveness of Diploma's whistleblowing framework. Its responsibilities include:

### Receipt and Assessment of Reports

IA receives whistleblowing reports from Safecall and works with the Whistleblowing Oversight Committee – comprising the Group General Counsel and/or the Group CFO, as appropriate – to assess the information and determine the appropriate course of action.

### Investigation Oversight

The Committee determines whether an investigation is required and designates the most suitable party to lead it – either an internal team or an independent third party. Where internal resources other than IA are assigned, they receive only a scope document created by the Committee, not the original whistleblowing report, to maintain confidentiality.

### Monitoring and Reporting

IA maintains oversight of all investigations triggered by whistleblowing reports, ensuring impartiality and thoroughness. The Committee also reports to the Board on issues raised through the helpline, as appropriate and when required.

### Training and Awareness

During all IA site visits, the team shares information about the whistleblowing helpline and this policy and provides basic awareness training to local employees. This reinforces the availability of confidential reporting and the importance of ethical conduct.

### Trend Monitoring and Reporting

The Whistleblowing Oversight Committee monitors the volume, themes, and resolution of whistleblowing reports across the Group. Aggregated data is reviewed periodically and may be shared with the Board and other stakeholders to support continuous improvement and risk oversight.

### Record Keeping

All whistleblowing records are securely maintained in line with data protection laws and are retained only as long as necessary to meet legal and governance obligations.

## External Audit

External auditors provide an additional layer of assurance by:

- **Reviewing the Whistleblowing Framework:** Assessing the provision, independence, and accessibility of the whistleblowing helpline.
- **Sample Testing:** Conducting sample testing of investigation outcomes to evaluate the effectiveness, consistency, and documentation of the process.
- **Monitoring Logs:** Reviewing logs and records related to whistleblowing reports to ensure appropriate handling and follow-up.

## 11 Compliance & Non-Compliance

All individuals covered by this policy are expected to uphold its principles and act in accordance with Diploma's values. The following behaviours will be treated as disciplinary matters and may result in action under the Group's Disciplinary Procedure (as outlined in the [Group Code of Conduct](#)):

- Knowingly making a false or malicious allegation
- Abusing this policy for personal or vindictive reasons
- Failing to report or escalate a known or suspected breach without good reason
- Retaliating against, or participating in retaliation against, a whistleblower or someone supporting an investigation
- Causing damage to Diploma's reputation, stakeholders, or third parties through a breach of this policy

Disciplinary actions will be proportionate and handled in line with established procedures. In serious cases, a breach may constitute gross misconduct and could lead to termination of employment or contract. Breaches may also result in legal action where appropriate.

## 12 Contacts

If you have questions about this policy or need to report a concern directly, you may contact the following individuals:

- **Group General Counsel:** [Anna.Lawrence@diplomapl.com](mailto:Anna.Lawrence@diplomapl.com)
- **Group HR Director:** [Donna.Catley@diplomapl.com](mailto:Donna.Catley@diplomapl.com)
- **Group Internal Audit:** [Internal.Audit@diplomapl.com](mailto:Internal.Audit@diplomapl.com)
- **Group CFO:** [Wilson.Ng@diplomapl.com](mailto:Wilson.Ng@diplomapl.com)
- **Group CEO:** [Johnny.Thomson@diplomapl.com](mailto:Johnny.Thomson@diplomapl.com)

If you prefer to raise your concern confidentially or anonymously, you can use Diploma's independent whistleblowing hotline, operated by Safecall:

- **Freephone:** visit the Safecall website for the local number in your country
- **Online Reporting:** [safecall.co.uk/file-a-report](https://safecall.co.uk/file-a-report)
- **Email:** [diploma@safecall.co.uk](mailto:diploma@safecall.co.uk)

Safecall is available 24/7. Reports are not recorded, and your anonymity will be protected if requested.