

Whistleblowing policy

Policy Purpose

We are committed to conducting our business with honesty and integrity and we expect all employees to maintain high standards. Any suspected wrongdoing should be reported as soon as possible.

What is whistleblowing?

Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to our activities. This includes bribery, facilitation of tax evasion, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment and any breach of legal or professional obligations.

How to raise a concern

We hope that in many cases you will be able to raise any concerns with your Line manager. However, where you prefer not to raise it with your Line manager for any reason, you should contact the Whistleblowing Officer Jean-Phillippe Verhelle, Chief Operating Officer or the Chief Executive Officer Director, Tony Lawman. Contact details are at the end of this policy.

We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a work colleague or Trade union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

Confidentiality

We hope that staff will feel able to voice whistleblowing concerns openly under this policy. Completely anonymous disclosures are difficult to investigate. If you want to raise your concern confidentially, we will make every effort to keep your identity secret and only reveal it where necessary to those involved in investigating your concern.

External disclosures

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally. The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. We strongly encourage you to seek advice before reporting a concern to anyone external. The Company operates a confidential helpline. Their contact details are at the end of this policy.

Protection and support for whistleblowers

We aim to encourage openness and will support whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken.

Whistleblowers must not suffer any detrimental treatment as a result of raising a genuine concern. If you believe that you have suffered any such treatment, you should inform Jean-Phillippe Verhelle, COO or your HR Representative immediately. If the matter is not remedied, you should raise it formally using our Grievance Procedure.

Individuals must not threaten or retaliate against whistleblowers in any way. If any employee is involved in such conduct, they may be subject to disciplinary action.

However, if we conclude that a whistleblower has made false allegations maliciously, the whistleblower may be subject to disciplinary action.

The Company operates a confidential helpline. Their contact details are included below:

Contacts

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| Whistleblowing Officer | Jean-Phillippe Verhelle JPVerhelle@abl1touch.com 07990 056 776 |
| Chief Executive Officer | Tony Lawman Tlawman@abl1touch.com 07740 825 278 |
| Safecall Independent Whistleblowing Organisation | Helpline: 0800 915 1571 Website: File a Report - Safecall Ltd |

Policy application

This policy covers all employees, officers, consultants, contractors, volunteers, interns, casual workers, and agency workers.

This policy does not form part of any employee's contract of employment, and we may amend it at any time

Policy Review

This Policy will be reviewed annually to ensure that it continues to meet the Company's objectives and regulatory requirements. Any changes to the Policy will be approved by the Board of Directors.

Policy Queries

Any queries relating to this policy should be directed to the Head of HR at hr@abl1touch.com

Policy Approval and Endorsement

This policy has been approved and endorsed by the Board of Directors and the Management. We believe that by adhering to these guidelines, we will make meaningful contributions to societal well-being.

Formalised and approved by the board of directors on **20th February 2024**

| Date issued | Version number | Date reviewed | Approved |
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